Attachment No. 1

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

November 17, 2003

VIA: Express Mail and Facsimile

Donald Powell
US Postal Vehicle Maintenance Service
60 West Oliver Street
Baltimore, Maryland 21201

Dear Mr. Powell:

The Environmental Protection Agency ("EPA") Region III along with the *appropriate State Agency*, will conduct a multi-media compliance inspection at **the US Postal Vehicle Maintenance Service beginning on Monday, November 24, 2003.** This letter will serve as EPA's official inspection notification. The inspection and this request for information are authorized under the provisions of the Clean Water Act ("CWA"), Section 308, 33 U.S.C § 1318; the Resource Conservation and Recovery Act ("RCRA"), Section 3007, 42 U.S.C. § 6927; the Toxic Substances Control Act ("TSCA"), 15 U.S.C § 2610; the Emergency Planning and Community Right to Know Act ("EPCRA'), Section 313, 42 U.S.C.§ 11023; and the Clean Air Act.

Gerard Crutchley will lead a team of EPA and *State* investigators. Mr. Crutchley will be available at the start of the inspection to brief you and your representatives on the purpose and the scope of this inspection. You are welcome to contact Mr. Crutchley directly at (410) 305-2780 to discuss the inspection arrangements, including access to any sensitive areas. The objective of this inspection is to determine the compliance status of the facility with applicable environmental laws, regulations, consent decrees, approvals and permits. The length of the inspection depends on the amount of compliance areas to review and the level of cooperation and preparation by the US Postal Vehicle Maintenance Service.

EPA believes conducting a multi-media compliance inspection provides broad information that can lead to the greatest reduction of overall risk to human health and the environment (by assuring the facility is in compliance and exploring pollution prevention opportunities). We believe that the informal debriefing and the subsequent inspection report will assist your facility in planning and budgeting for any corrective measures that may be required for compliance. *A copy of the inspection report will be made available to you once it is completed, usually within six to nine months after the inspection.*

The attached enclosure lists the information that we require in conducting this inspection. In order to expedite the site visit, we would appreciate your help in having these records and documents available at the start of the inspection. If possible our inspectors would also

appreciate a designated area to assemble and review documents. In addition, the inspectors may wish to take photographs in selected areas. If there are any areas that require security clearance, please identify these areas to Mr. Crutchley so that we can ensure the appropriate security clearances have been obtained by EPA personnel.

If you have any questions about this inspection please contact Mr. Crutchley who can be reached at (410) 305-2780. Or please contact me at (215) 814-2148.

Thank you for your assistance in this matter. EPA will cooperate with your staff to ensure minimal disruption to the important work ongoing at your facility.

Sincerely,

Jose J. Jiménez
Federal Facilities Coordinator

Attachment No. 2

RECORDS/DOCUMENTS REQUEST

GENERAL PROCEDURE

The EPA inspection will proceed in two stages. First, EPA will identify various records to be reviewed. Generally, these records will date back three years from the present, but some of the records will be for other specific time periods. Second, according to a schedule to be developed on site, EPA will review the records and request copies, as needed. The following documents are requested to be made available during the inspection. Other records may be identified for review during the inspection. **Please be aware that this request is somewhat generic in nature and all of the information requested may not be applicable to your facility.**

GENERAL:

1. Facility map and plot plan
2. Organizational chart(including environmental department)
3. Description of facility and operations
4. List of on-site laboratories and types of analyses conducted
5. Inventory of chemicals and quantities purchased during the last three (3) years
6. Enforcement actions/Notices of violations (NOVs)
7. Consent Decrees/Orders/Agreement and related correspondence
8. Environmental project/funding summary

RESOURCES CONSERVATION AND RECOVERY ACT (RCRA)

1. RCRA Part A Permit Application (original and any revisions).

2. Determinations for whether any solid wastes generated are hazardous wastes and any waste analysis data or other documentation supporting the determinations. Include documentation of any analytical results of waste (including wastewaters) generating at the facility, including EP and TCLP toxicity testing, corrosivity testing, and testing which establishes whether or not a material meets the definition of a characteristic waste. Include any waste analysis data or other documentation which establishes whether or not any used oil generated on-site meets the used oil specification.

3. EPA identification numbers allowing the facility to treat, store, dispose of, transport, or offer for transportation any hazardous wastes.

4. Manifests for any hazardous wastes transported, accepted, or offered for transportation

off-site (manifests for the past three years) including Land Disposal Restriction notifications and certifications (past five (5) years).

5. Biennial reports for shipping any hazardous wastes off-site to a treatment, storage, or disposal facility or for treating, storing , or disposing of any hazardous wastes on site (last 3 years).

6. Exception reports for any manifests not received back from the designated facility (last 3 years).

7. Un-manifested waste reports for any hazardous wastes received from off-site without accompanying manifests.

8. Notifications for any hazardous wastes intended to be exported.

9. Any notifications, pre-compliance and compliance certifications submitted for burning of hazardous wastes in boilers or industrial furnaces.

10. Analytical results and accumulation records for any recyclable material utilized for precious metal recovery.

11. Schedule and logs for inspecting all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that are important to preventing, detecting, or responding to environmental or human health hazards.

12 Employee training records for hazardous waste handlers, **including job titles and descriptions**, names of each employee, and documentation of the type and amount of training each has received. Provide a copy of the hazardous waste training plan.

13. Current Contingency Plan including summary reports and documentation of incidents that require implementation of the contingency plan (past three (3) years).

14. Methods and dates for treating, storing, or disposing of any hazardous wastes at the facility.

15. Location and quantity of each hazardous waste within the facility.

16. Plot plan showing locations of all less than ninety (90) day accumulation areas and tanks. Also identify locations of all waste operation points and satellite accumulation areas.

17. Inspection schedules, logs/summaries for all container storage areas and <90 accumulation areas (last three (3) years).

18. Groundwater sampling and analysis plan for any impoundment, landfill, or land treatment facilities on-site.

19. Outline of ground water quality assessment program for any impoundment, landfill, or land treatment facilities on-site.

20. Ground water analysis and reports for any impoundment, landfill, or land treatment facilities on-site.

21. Closure and post-closure plans for any hazardous waste disposal facilities, waste piles, surface impoundments, tanks, or landfills

22. Certifications for any hazardous waste disposal facilities, waste piles, surface impoundments, tanks or landfills that have been closed.

23. Certifications for any post-closure care that has bee completed on any hazardous waste disposal facilities, waste piles, surface impoundments, tanks or landfills.

24. Certified assessment of integrity for any existing tank systems used for storing for treating hazardous waste that do not have secondary containment.

25. Certified assessment of design and construction for any new tank systems used for storing or treating hazardous waste.

26. Certified statements for any tank systems used for storing or treating hazardous waste that have been repaired.

27. Inspection schedules, logs, summaries for all tank systems, surface impoundments, and waste piles used for storing or treating hazardous waste (last three (3) years).

28. Notification and reports of any hazardous waste releases to the environment.

29. Hazardous waste minimization plan and certification of program which reduces the volume and toxicity of hazardous waste.

UNDERGROUND STORAGE TANKS

1. List of all underground storage tanks (USTs) ever in operation including tanks currently in operation, temporarily closed or permanently closed. List should include location, age, construction material, and current status.

2. Notifications for any underground storage tanks.

3. Certifications for any new underground storage tanks.

4. Reports of any releases, spills, or overfills from underground storage tanks.

5. Reports summarizing initial abatement steps, site characterization and free product removal at confirmed release sites.

6. Corrective action plans required as a result of any releases, spills, or overfills from underground storage tanks.

7. Notifications of any underground storage tank changes, upgrades, or closures.

8. Documentation of operation for any corrosion protection equipment required on underground storage tanks.

9. Documentation of any underground storage tank repairs.

10. Documentation for complying with any underground storage tank release detection requirements.

11. Results or any site investigations conducted upon closure of any underground storage tanks.

12. Financial responsibility documentation for USTs.

TOXIC SUBSTANCES CONTROL ACT (TSCA)

Polychlorinated Biphenyls (PCBs)

1. List or description of any PCB items or PCB storage areas.

2. Monthly inspection records for storage areas subject to 40 CFR § 761.65.

3. PCB transformer and hydraulic systems inventory with location map and PCB analyses.

4. Inspection and maintenance records for PCB transformer and hydraulic systems of the last three (3) years.

5. Notification to EPA of PCB activity (EPA Form 7710-53).

6. Notification to local fire department of location of PCB transformers.

7. Copies of all uniform Hazardous Waste Manifests for PCB waste transported off-site since 1995.

8. Copies of PCB Annual Document logs

EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW (EPCRA) (If applicable)

1. Threshold determination calculations for each of the 313 chemicals used by your facility during the 1995, 1996, 1997 & 1998 calendar years along with supporting documentation

2. Documentation used to establish/derive Form R data elements submitted by your facility for such items as: Activities and Uses of the Chemical at the Facility (Section 3); the Maximum Amount of Chemical On-Site at Any Time During the Calender Year (Section 4); Releases of the Chemical to the Environment On-Site (Section 5); Transfers of the Chemical in Wastes to Off-Site Locations (Section 6); On-Site Waste Treatment Methods and Efficiencies (Section 7A); On-Site Energy Recovery Processes from Section 7B (only for calender year 1991 and beyond); On-Site Recycling Processes from Section 7C (only for calender year 1991 and beyond) and; Source Reduction and Recycling Activities from Section 8 (only for calender year 1991 and beyond).

3. Copies of the Form R reports submitted by the facility for the last four years.

CLEAN WATER ACT (CWA)

1. Current pretreatment permit application (s) including industrial, sanitary, and storm water including any information on changes in process waste streams since permit application submittal.

2. Pretreatment permit (s) effective during the last three (3) years.

3. Exceptions/exemptions from current pretreatment permit requirements.

4. Copies of all reports/plans required by pretreatment permit including: best management plans (BMPs), water quality impact assessments, toxicity studies, sludge management, spills plans, etc.

5. Any compliance order, schedule, penalty assessment, or other enforcement action issued in the last three (3) years and related correspondence.

6. Discharge monitoring reports (DMRs) for the last three (3) years. Written calibration procedures for flow measuring and recording equipment: include industrial, storm, sanitary, or any other sewers on facility property. The written sampling, preservation and chain of custody procedures should also be provided. Sampling and analysis records. Analytical records to include review of analytical procedures, quality control practices, and tracking of raw data through DMR preparation.

7. Any correspondence regarding exceedance of discharge limitations during the last three (3) years.

8. Most recent inspection report and response.

9. All plans and/or written description of the sewer system (including by-pass capability), outfall locations, and monitoring stations.

10. Copies of any other pretreatment or sewer use ordinances or permits.

11. Identify all septic systems, including those no longer in service.

14. Operation and Maintenance manuals for Industrial Wastewater Treatment Plant

FEDERAL INSECTICIDE, FUNGICIDE, and RODENTICIDE ACT (If applicable)

1. List of restricted use pesticides (including anti-fouling paints).

2. Any records or other documentation regarding pesticide application.

WETLANDS (If applicable)

1. Copies of all wetlands (404) permits and notifications for the last ten years.

2. Map indicating the location of any construction, dredging or earth moving activities within the last ten years.

3. Map indicating the delineation of any wetlands or other waters located adjacent to the facility and if there are such locations, documentation that might indicate that the work was verified by a federal or state agency.

4. Map indicating the location of any construction, dredging or land clearing activities planned for the next five years.

CLEAN AIR ACT (If applicable)

1. Plot plan of the facility showing location and identification of all major process areas and stacks.

2. Brief descriptions for all process areas to include:
   (a) simplified process flow diagrams
   (b) pollution control equipment

3. Permits and/or variances for air emission sources and related correspondence.

4. MACT correspondence and applications to the State if applicable.

5. Consent Decrees/Orders/Agreements still in effect.

6. Fuel oil usage - gallons/year to include the sulfur content of the oil (including certificate of analysis).

7. Stack tests (most recent) and stack and ambient monitoring data.

8. Performance specification tests for continuous emission monitors.

9. State emissions inventory report for the last four years.

10. Any project modification/re-construction information.

11. Procedures/manuals for the operation and inspection of pollution control equipment.

12. Required notices and any other pertinent records related to asbestos demolition/renovation projects in progress or completed within the last four years.

13. Any facility inspection reports (federal, state & internal.

14. Excess emission reports for the last four years.

15. Paint usage - gallons/year.

16. Paint compound records to include compound names and CAS Nos (including MSDS sheets).

17. Provide the facility CFC compliance program relative to disposal, maintenance, and handling of CFC containing equipment.

Attachment No. 3

Detailed Facility Report

Report Error | Data Dictionary

For Public Release - Unrestricted Dissemination Report Generated on 11/14/2003
US Environmental Protection Agency - Office of Enforcement and Compliance Assurance

Facility Permits and Identifiers

Data Dictionary

Statute	System	Source ID	Facility Name	Street Address	City	State	Zip
	FRS	110001798911	US POSTAL VEHICLE MAINTENANCE SERVICE	60 WEST OLIVER STREET	BALTIMORE	MD	21201
CAA	AFS	2451002427	U.S.P.S.-60 WEST OLIVER STREET	60 OLIVER STREET, WEST	BALTIMORE	MD	21201
RCRA	RCR	MDD980707483	USPS BALTIMORE VMF	60 W OLIVER ST	BALTIMORE	MD	21201
RCRA	RCR	MD3180090018	USPS BALTIMORE VMF	60 W OLIVER ST	BALTIMORE	MD	21201

Facility Characteristics

Data Dictionary

Statute	Source ID	Facility Status	Permit Expiration Date	Lat/Long	Indian Lands?	SIC Codes	NAICS Codes
CAA	2451002427	Operating, Minor (Not Fed.Rep.)			NA	4311	
RCRA	MDD980707483	CESQG			No		49111

If the CWA permit is past its expiration date, this normally means that the permitting authority has not yet issued a new permit. In these situations, the expired permit is normally administratively extended and kept in effect until the new permit is issued.

Inspection and Enforcement Summary Data

Data Dictionary

Statute	Source ID	RECAP Insp. Last 05Yrs	Date of Last Inspection	Formal Enf Act Last 05 Yrs	Penalties Last 05 Yrs
CAA	2451002427	0	Never	0	$00
RCRA	MDD980707483	0	08/26/1986	0	$00
RCRA	MD3180090018	2	02/04/2003	0	$00

Inspection History (05 years)

Data Dictionary

Statute	Source ID	Inspection Type	Lead Agency	Date
RCRA	MD3180090018	NON-FINANCIAL RECORD REVIEW	State	03/03/1999
RCRA	MD3180090018	OTHER EVALUATION	State	02/04/2003

Entries in *italics* are not considered inspections in Reporting for Enforcement and Compliance Assurance Priorities (RECAP) official counts.

Compliance Summary Data

Data Dictionary

Statute	Source ID	Current SNC/HPV?	Current As Of	Description	Qtrs in NC (of 8)
CAA	2451002427	N/A	10/19/2003		
RCRA	MDD980707483	NO	10/19/2003		0
RCRA	MD3180090018	NO	10/19/2003		0

Two Year Compliance Status by Quarter Data Dictionary

Violations shown in a given quarter do not necessarily span the entire 3 months.

AIR Compliance Status								
Statute:Source ID CAA: 2451002427	QTR1 Jan-Mar02	QTR2 Apr-Jun02	QTR3 Jul-Sep02	QTR4 Oct-Dec02	QTR5 Jan-Mar03	QTR6 Apr-Jun03	QTR7 Jul-Sep03	QTR8 Oct-Dec03
HPV History								
Program/Pollutant in Current Violation								
SIP	C-INSP	C-INSP	C-INSP	C-INSP	C-INSP	C-INSP	C-INSP	C-INSP

High Priority Violator (HPV) History section: "Unaddr" means the facility has not yet been addressed with a formal enforcement action. "Addrs"means the facility has been addressed with a formal enforcement action, but its violations have not been resolved. Lead Agency designated can be US EPA, State, Both, or No Lead Determined. If HPV History is blank, then the facility was not a High Priority Violator. C=Compliance; V=Violation; S=Compliance Schedule.

Informal Enforcement/Notices of Violation - AFS, PCS, RCRAInfo (05 year history) Data Dictionary

Statute	Source ID	Type of Action	Lead Agency	Date
- No data records returned.				

Formal Enforcement Actions - AFS, PCS, RCRAInfo, NCDB (05 year history) Data Dictionary

Statute	Source ID	Type of Action	Lead Agency	Date	Penalty	Penalty Description
- No data records returned.						

In some cases, formal enforcement actions may be entered both at the initiation and final stages of the action. These may appear more than once above. Entries in *italics* are not "formal" actions under the PCS definitions but are either the initiation of an action or penalties assessed as a result of a previous action. This section includes US EPA and State formal enforcement actions under CAA, CWA and RCRA.

EPA Formal Enforcement Actions - ICIS (05 year history) Data Dictionary

Primary Law/Section	Case Number	Case Type	Case Name	Issued/Filed Date	Settlement Date	Penalty	SEP Cost
- No data records returned.							

Federal enforcement actions and penalties shown in this section are from the Integrated Compliance Information System (ICIS). These actions may duplicate records in the Formal Enforcement Actions section.

History of Reported Chemicals Released in Pounds per Year at Site: Data Dictionary

Year /	Total Air Emissions	Surface Water Discharges	Underground Injections	Releases to Land	Total On-site Releases	Total Off-site Transfers	Total Releases and Transfers
- No data records returned.							

TRI Total Releases and Transfers by Chemical and Year

Chemical Name	1993	1994	1995	1996	1997	1998	1999	2000	2001
- No data records returned.									

Demographic Profile of Surrounding Area (3 Miles) Switch to 1 Mi 5 Mi Data Dictionary

This section is to provide context regarding the community setting of the facility. No relationship between this information, and other data included in this report is implied. Statistics are based upon the 2000 US Census data, and are accurate to the extent that the facility latitude and longitude listed below are correct. The latitude and longitude are obtained from the EPALocational Reference Table(LRT) when available. N/A = Not yet available from the Census Bureau for 2000 Census.

Radius of Area:	3 Miles	Land Area:	93.44%	Households in area:	N/A
Center Latitude:	39.3065	Water Area:	6.56%	Housing units in area:	161,104
Center Longitude:	-76.6177	Population Density:	12287.91/sq. mi.	Households On Public Assistance:	N/A
Total Persons:	332,996	Percent Minority:	72.35%	Persons Below Poverty Level:	N/A

Race Breakdown	Persons (%)	Age Breakdown:	Persons (%)
White:	94,722 (28.45%)	Child 5 years and less:	19,709 (5.92%)
African-american:	222,742 (66.89%)	Minors 17 years and younger:	78,991 (23.72%)
Hispanic-Origin:	6,535 (1.96%)	Adults 18 years and older:	252,780 (75.91%)
Asian/Pacific Islander:	7,167 (2.15%)	Seniors 65 years and older:	25,651 (7.70%)
American Indian:	1,185 (0.36%)		
Other race:	7,180 (2.16%)		

Education Level (Persons 25 & older)	Persons (%)	Income Breakdown:	Households (%)
Less than 9th grade:	N/A	Less than $15,000:	N/A
9th-12th grades:	N/A	$15,000-$25,000:	N/A
High School Diploma:	N/A	$25,000-$50,000:	N/A
Some College/2-yr:	N/A	$50,000-$75,000:	N/A
B.S./B.A. or more:	N/A	Greater than $75,000:	N/A

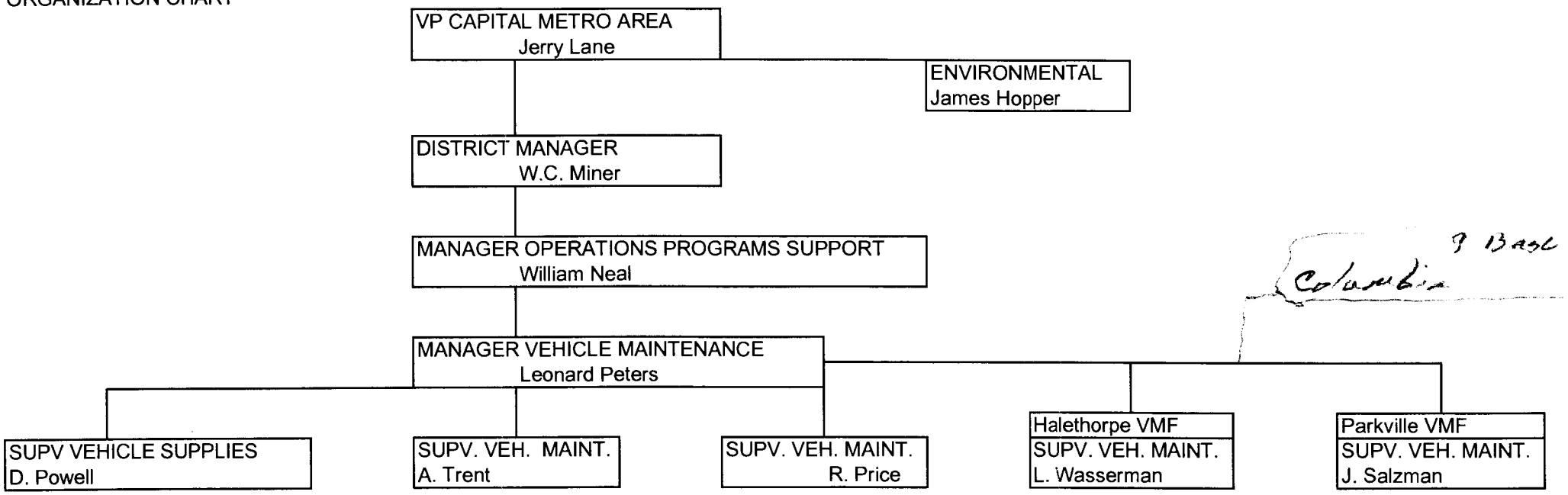
Please note: Entries in gray denote records that are not federally required to be reported to EPA. These data may not be reliable.

Map Returned Facility

This report was generated by the Integrated Data for Enforcement Analysis (IDEA) system, which updates its information from program databases monthly. The data were last updated: AFS: 10/19/2003. RCRAInfo: 10/19/2003. FRS: 10/16/2003.

Some regulated facilities have expressed an interest in explaining data shown in the Detailed Facility Reports in ECHO. Please check company web sites for such explanations.

ORGANIZATION CHART



Attachment No. 4

Attachment No. 5

WEEK BEGINNING:		WEEK ENDING:							AP	2
11/22/2003		11/28/2003							PP	25
									WK	2
ASSIGNMENT SHEET - MAIN VMF - TOUR 1										
		WORK WEEK (X = OFF DAYS)								
		SAT	SUN	MON	TUE	WED	THU	FRI		
119	JEFFRIES, P. MECH.	2250-0700	X	2250-0700	2250-0700	2250-0700	HOL	2250-0700	T-2	
107	CLAYTOR, T. MECH.	2250-0700	X	2250-0700	2250-0700	2250-0700	HOL	2250-0700	T-1	

WEEK BEGINNING:		WEEK ENDING:							AP	2
11/22/2003		11/28/2003							PP	25
									WK	2
ASSIGNMENT SHEET - MAIN VMF - TOUR 2										
		WORK WEEK (X = OFF DAYS)								
		SAT	SUN	MON	TUE	WED	THU	FRI		
179	PETERS, L. MANAGER VMF	X	X				HOL			
111	POWELL, D. SUPV. VEH. SUP	X	X				HOL			
175	TRENT, A. SUPV. VMF					HOL	X	X		
112	JACKSON, W. LEAD TECH.	0400-1250	0400-1250	X	0400-1250	0400-1250	HOL	0400-1250	LT- 2	
117	KREH, P. BODY	0400-1250	X	0400-1250	0400-1250	0400-1250	HOL	0400-1250	BM-2	
163	MICHAELANGELO, C. BODY	X	X	LWOP	LWOP	LWOP	LWOP	LWOP	BM-1	
155	WHEELER, L. PAINTER	X	0600-1450	0600-1450	0600-1450	0600-1450	HOL	0600-1450	P-1	
110	WIRTS, R. LEAD TECH.	X	X	0800-1650	0800-1650	0800-1650	HOL	0800-1650	LT-1	
149	NEVILLE, G. LEAD TECH.	0400-1250	X	0400-1250	0400-1250	0400-1250	HOL	0400-1250	LT- 5	
130	LIMMER, M. MECH.	X	0600-1450	0600-1450	0600-1450	0600-1450	HOL	0600-1450	T - 4	
103	MEASMER, J. MECH.	X	X	0600-1450	0600-1450	0600-1450	HOL	0600-1450	T - 6	
120	SCANLON, R. MECH.	0400-1250	0600-1450	X	0400-1250	0400-1250	HOL	0400-1250	T - 5	
108	MERSON, V. MECH.	X	X	0600-1450	0600-1450	0600-1450	HOL	0600-1450	T - 7	
140	WIENHOLD, F. MECH.	0400-1250	X	0400-1250	0400-1250	0400-1250	HOL	0400-1250	T - 8	
116	JONES, W. MECH.	X	X	0700-1550	0700-1550	0700-1550	HOL	0700-1550	T - 3	
132	MILLER, G. MECH.	0600-1450	0600-1450	0700-1550	0700-1550	0700-1550	HOL	X	T - 9	
122	GREGORY, M. MECH	0400-1250	0600-1450	X	0400-1250	0400-1250	HOL	0400-1250	M - 2	
148	WILLIAMS, L. MECH.	0600-1450	0600-1450	0400-1250	0400-1250	0400-1250	HOL	X	M - 1	
170	ROOSELVELT, ROACH	0500-1350	X	0500-1350	0500-1350	0500-1350	HOL	0500-1350	G - 1	
125	BENTZ, C. TIRE MAN	0600-1450	X	0600-1450	0600-1450	0600-1450	HOL	0600-1450	TR - 1	
104	BURNS, A. STOREKEEPER	X	0600-1450	0600-1450	0600-1450	0600-1450	HOL		SK - 1	
144	BLAYLOCK, R.	0500-1350	X	0700-1550	0700-1550	0700-1550	HOL	0700-1550	TP - 2	
173	JACKSON, G. VMF CLERK	0500-1350	X	0700-1550	0700-1550		HOL			
176	CROWNER, M. VMF CLERK	0500-1350	X	0700-1550	0700-1550	0700-1550	HOL	0700-1550		
168	BRYANT, L. VMF CLERK	0500-1350	X	0700-1550	0700-1550	0700-1550	HOL			
202	THOMAS, CUSTODIAN	0600-1450	0600-1450	X	0600-1450	0600-1450	HOL			

WEEK BEGINNING:	WEEK ENDING:							AP	2
11/22/2003	11/28/2003							PP	25
								WK	2
ASSIGNMENT SHEET - MAIN VMF - TOUR 3									
		WORK WEEK (X = OFF DAYS)							
		SAT	SUN	MON	TUE	WED	THU	FRI	
128	PRICE, R. SUPV. TOURIII		X			X	HOL		
113	FALKENKLOUS, P. BODY	1200-2050	X	1400-2250	1400-2250	1400-2250	HOL	1400-2250	BM-3
136	YUHAS, G. BODY	X	0600-1450	1400-2250	1400-2250	1400-2250	HOL	1400-2250	BM-4
	VACANT . LEAD TECH.	X	0600-1450	1400-2250	1400-2250	1400-2250	HOL	X	LT-3
150	MEEKINS, D. MECH.	X	X	1200-2050	1200-2050	1200-2050	HOL	1200-2050	T-10
106	BABCOCK, B. MECH.	X	X	1400-2250	1400-2250	1400-2250	HOL	1400-2250	M - 4
109	KEEN, H. MECH.	X	X	LWOP	LWOP	LWOP	LWOP	LWOP	T-11
143	CASEY, R. MECH.	1200-2050	0600-1450	X	1200-2050	1200-2050	HOL	1200-2050	T-16
171	RUFFIN, R. MECH.	X	0600-1450	1200-2050	1200-2050	1200-2050	HOL	1200-2050	T-12
141	CALDWELL, L	1200-2050	0600-1450	1400-2250	1400-2250	1400-2250	HOL	1400-2250	
	MECH. VACANT	X	X	1400-2250	1400-2250	1400-2250	HOL	1400-2250	M - 3
114	KERR, D. MECH	1200-2050	X	1400-2250	1400-2250	1400-2250	HOL	1400-2250	T-14
123	BROKOS, J. MECH	1200-2050	X	1400-2250	1400-2250	1400-2250	HOL	1400-2250	T- 15
	GARAGEMAN								
170	GARAGEMAN VACANT	X	X	1400-2250	1400-2250	1400-2250	HOL	1400-2250	G-2
	TOOLS & PARTS	0700-1550	0600-1450	1400-2250	1400-2250	1400-2250	X	X	TP- 1
201	MICHAEL JENKINS	1000-1850	X	1400-2250	1400-2250	1400-2250	HOL	1400-2250	TP- 3
200	SHEARIN, J. CUSTODIAN	X	0600-1450	1400-2250	1400-2250	1400-2250	HOL	1400-2250	
	PART TIME FLEX:								

SHIPPING DOC

Attachment No. 6

ent #:

ent #: 0012230

Generator	US Post Office
US EPA ID#:	NOT Required
Address	601 Oliver St
City	Baltimore State MD Zip
Contact	Phone
Transporter 1:	A&A Environmental
US EPA ID#:	NOT Required Phone 410-636-2294
Transporter 2:	
US EPA ID#:	Phone

Facility: A & A Environmental/US Liquids

- ☒ 1500 Carbon Avenue, Baltimore MD 21226 (800) 404-8037
- ☐ 195 Wyche Road, Stafford VA 22554 (877) 441-6930
- ☐ 317-B Lemonhill Lane, Salisbury MD 21801 (800) 411-3353
- ☐ 1531 Commerce Ave, Carlisle PA 17013 (877) 520-0022

Other Facility

Address

City State Zip

Non RCRA/Non DOT Regulated Materials-Solids

Line		Profile #
____	Spill Debris	25000A
____	Tank Bottoms	23000C
____	Soil, Petroleum	24000A
____	Soil, Gasoline for Recycling	24000F
____	Sorbents, Gasoline for Recycling	24000G
____	Sorbents, Jet Fuel	24000H
____	Sorbents, Oil	24000I
____	Oil, Sludge	23000A
____	Gasoline, Sludge for Recycling	23000B
____	Industrial Sludge	23000D
____	Construction Debris	25000B
____	Fly Ash	24000B
____	Scale	24000C
____	Gasoline Filters for Recycling	24000E
____	Oil Filters for Recycling	24300A
____	Empty Drums	24400A
____	Other	
____	Other	

Non RCRA/Non DOT Regulated Materials-Liquids

Line		Profile #
____	Wastewaters	20020A
____	Oil, Water for Recycling	21050A
____	Oil for Recycling	21050B
____	Oil, Water, Sludge for Recycling	21050C
____	Mineral Oil for Recycling	21050D
____	Glycols for Recycling	21070A
____	Diesel, Water for Recycling	22070F
____	Kerosene, Water for Recycling	22070D
____	Commercial Contact Water	20020B
____	Other	

DOT Regulated/Non RCRA Materials - Liquids

Line		Profile #
A	Gasoline Mixture for Recycling 3,UN1203,PGII ERG #128	22070A
____	Gasoline for Recycling 3,UN1203,PGII ERG #128	22070B
____	Combustible Liquid NOS,NA1993,PGII ERG #128	22070C
____	Diesel Fuel 3,NA1993,PGIII ERG #128	22070G
____	Fuel, Aviation, Turbine Engine 3,UN1863,PGII ERG #128	22070H
____	Kerosene 3,UN1223,PGIII ERG #128	22070E
____	Other	

Additional Information:

24 Hr Emergency# (800) 404-8037

Line	Profile No.	Containers No.	Containers Type	Total Quantity	Unit Wt./Vol.	Quantity Liquid	Quantity Solid	Quantity Sludge	Notes
A	22070A	2	DF	55	G				
B									
C									
D									
E									
F									

Generator's Certification: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste. I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable and national government regulations.

Type/Print Name	Signature	Month	Day	Year
Donald Lee Powell		11	12	03

Transporter 1 Acknowledgement of Receipt of Materials

Type/Print Name	Signature	Month	Day	Year
Roy D Carter	Roy D Carter	11	12	03

Transporter 2 Acknowledgement of Receipt of Materials

Type/Print Name	Signature	Month	Day	Year

Discrepancy Indication Space

Facility Owner or Operator: Certification of receipt of materials covered by this manifest except as noted in Discrepancy area above.

Type/Print Name	Signature	Month	Day	Year

GENERATOR'S COPY

24 Hour Emergency Service
(800) 404-8037

A&A ENVIRONMENTAL
A Division of US LIQUIDS
QUALITY • DEPENDABILITY • VALUE

No. _____

☐ *Maryland Office*
5200 Raynor Ave.
Linthicum Heights, MD 21090
(410) 636-3700 - FAX (410) 636-0260

☐ *Virginia Office*
19000 Possum Point Rd.
Dumfries, VA 22026
(703) 441-6930 - FAX (703) 221-1904

DAY: WED
DATE: 11/12/03

SHEET: 1
OF: 1

JOB LOCATION: U S post office
601 Oliver st
Baltimore MD

BILL TO: SAME

CONTACT: _____
PHONE: _____

CONTACT: _____
PHONE: _____

JOB DESCRIPTION: P/U 1-55 gal, 1-30 gal gasoline & H_2O
For Recycling At Arbonne

LABOR: (S=SUPER, F=FOREMAN, E=EQUIP. OP., T=FIELD TECHNICIAN)

TITLE/NAME	START TIME	STOP TIME	ST. HRS.	OT. HRS.	DT. HRS.
Roy Carter	1430	1830			

EQUIPMENT

TYPE	TRK. NO.	START TIME	STOP TIME	HRS.
Box	1430	1830		

MATERIALS

DESCRIPTION	QTY.
STA-DRI	
17-H DRUM (OPEN)	
17-E DRUM (CLOSED)	
YELLOW TYVEK	
RAIN GEAR	
SORBENT PADS - BALES	
SORBENT BOOM - EACH	
SORBENT BOOM - BALES	
PILLOWS	

DESCRIPTION	QTY.
GLOVES - COTTON	
GLOVES	
DUCT TAPE	
AIR BOTTLES	
OVERBOOTS	
DISPOSABLE BOOTS-YLW	
COMBO CARTRIDGE	
CHEMICAL CARTRIDGE	
POLY BAGS	

DESCRIPTION	QTY.

DISPOSAL

DESTINATION	AMOUNT	MANIFEST #	PRICE
LIQUID BULK	GLS.		
SLUDGE BULK	GLS.		
BAGS OF DEBRIS/PPE	EACH		
SOLIDS	DRMS.		
	LBS.		
	TNS.		
	YDS.		
OTHER			

ANALYSIS

DESCRIPTION	PRICE

SUBCONTRACTOR

DESCRIPTION	PRICE

A&A ENVIRONMENTAL SERVICES

PRINT NAME Roy D Carter
SIGNATURE Roy D Carter
DATE 11/12/03

CUSTOMER

PRINT NAME _____
SIGNATURE Lou Z Rull
DATE _____

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Multi-Media Compliance Inspection

United States Postal Service
Baltimore Vehicle Maintenance Facility
60 W. Oliver St.
Baltimore, Maryland 21201-5783

Date of Inspection: November 24, 2003

EPA Representatives:	Gerard W. Crutchley Environmental Protection Specialist (410) 305-2780
	Jose Jimenez Environmental Engineer EPA, Region III, Federal Facility Co-ordinator (215) 814-2148
Maryland Department of the Environment Representative:	Frank Ciurca Water Resources Engineer (410) 537-3521
Facility Representatives:	Leonard Peters Manager, Vehicle Maintenance (410) 625-8930
	Donald Powell Supervisor, Vehicle Supplies (410) 625-8929

Background

The EPA, Region III's Office of Enforcement Compliance and Environmental Justice (OECEJ) Facilities Enforcement Program requested that a multi-media compliance inspection be conducted at the United States Postal Services's Baltimore Vehicle Maintenance Facility. The inspection was assigned to Gerard Crutchley, Environmental Protection Specialist, OECEJ at Fort Meade, Maryland. The planning and coordination of the inspection were accomplished by both Gerard Crutchley and Jose Jimenez, Region III, Federal Facility Coordinator. The inspection was scheduled for November 24, 2003.

Prior to the scheduled date for the inspection, Mr. Jimenez contacted the Maryland Department of the Environment (MDE) to provide them with notification of the upcoming inspection. Mr. Jimenez spoke with Mr. Bernard Penner, Director of Special Programs. Mr. Penner, upon receiving notification, provided the information regarding the inspection to applicable State program offices within MDE and solicited their participation in the inspection.

On November 19, 2003, Mr. Jimenez provided official notification to the United States Postal Service that a multi-media compliance inspection would be conducted at their vehicle maintenance facility beginning November 24, 2003. The notification was made in the form of a telephone call and a notification letter (See Attachment No. 1). The notification letter included a request for the facility to have available for review, at the time of the inspection, records and documents required by the environmental statutes that would be addressed during the inspection (See Attachment No. 2).

Very little background information regarding the facility was available prior to the subject inspection. EPA, Region III had never inspected the facility and therefore there was no information on file with EPA. The EPA inspector spoke with inspectors from MDE's hazardous waste program and water program prior to the inspection, but both indicated that MDE did not have any information regarding the subject facility on file in their respective offices. The EPA inspector did obtain a copy of a facility report for the facility from EPA's IDEA data base. This report indicated that the facility had two RCRA I.D. numbers, but was classified as a conditionally exempt small quantity generator. The report also indicated that the facility had an air permit. A copy of the report is provided as an attachment (See Attachment No. 3).

An inspector, Frank Ciurca, with MDE's Water Program contacted Mr. Crutchley and indicated that he would accompany EPA during the inspection.

Prior to the subject inspection, the EPA team leader, Gerard Crutchley, was contacted by Mr. Leonard Peters, Manager, Vehicle Maintenance. While discussing the upcoming inspection, Mr. Peters provided some information regarding the subject facility. Specifically, he stated that the facility is a conditionally exempt small quantity generator. They generate very little hazardous waste, if any. Mr. Peters also said that they do not have any above ground storage tanks or underground storage tanks. Mr. Peters said that all of their underground tanks were removed in 1997/1998.

Inspection Activities/Observations

The EPA and State inspectors arrived at the subject facility on November 24, 2003 at

1000 and met with Mr. Leonard Peters and Mr. Donald Powell, Supervisor, Vehicle Supplies. The EPA inspectors presented their credentials to Mr. Peters identifying them as authorized representatives of EPA. The EPA inspectors provided Mr. Peters and Mr. Powell with a brief description of EPA Region III's Federal Facility Compliance Program and why the facility was selected for a multi-media inspection. The EPA team leader, Gerard Crutchley then provided facility personnel with a brief description of the scope of the subject inspection.

The EPA inspectors then asked Mr. Peters to provide a description of the subject facility, including the type of work that is performed on site and the waste materials that are generated as a result of the work. The facility, located at 60 W. Oliver St in Baltimore, was constructed in 1962. It has been a vehicle maintenance facility since that time. The facility comprises approximately 3.3 acres and consists of one large maintenance building. The facility employs approximately 36 people. They operate five days per week with a day and an evening shift. They also operate limited hours on the weekends. A listing of the employees and the hours worked is provided as an attachment to this report (See Attachment No. 5).

This facility is part of the U. S. Postal Service's VP Capital Metro Area. Mr. Peters as the manger for vehicle maintenance, oversees four facilities. The main facility located at 60 W. Oliver St, and three other vehicle maintenance facilities (Halethorpe, Parkville and Columbia). Each of the other three facilities operates independently of the main facility in terms of environmental management (e.g., they each have their own RCRA I.D. Nos.) and according to Mr. Peters there is no transfer of regulated waste materials between facilities. Mr. Peters did provide the inspectors with an organizational chart for the VP Capital Metro Area (See Attachment No. 4).

Mr. Peters said that the facility provides full maintenance services for approximately 1400 vehicles. These vehicles include tractor trailers, smaller cargo vans, small postal delivery vehicles, referred to as LLVs (long life vehicles), and some passenger type vehicles (sedans). Mr. Peters described the facility as generally a preventive maintenance type facility. They do normal type maintenance such as oil changes, tires, brakes, etc. Mr. Peters said they do some body work, including painting, but this does not comprise a large part of their normal workload. Mr. Peters said that only about 80 of the 1400 vehicles that they service are equipped with air conditioning. Mr. Peters said that any servicing of these units is contracted out and none is performed on site.

The facility does not have any vehicle fueling capability. According to Mr. Peters, the facility did have underground fuel tanks but they were all taken out of service and removed around 1998. Fueling facilities for U.S. Postal Service vehicles are currently located at another location in Baltimore City.

While conducting normal maintenance work, the facility does generate a number of waste materials including used oil, used anti-freeze, oil filters, trash, scrap metal, waste water, floor washer sediment, part washer filters, brake washer residue, spent sand from a sand blast unit, used absorbent material and spent filters from the paint booth.

According to Mr. Peters, the facility does not generate any hazardous waste. The facility at one time did use part washers that contained hazardous solvents, however they have since been changed over to non-hazardous part washers. The facility maintains a hand written log book in

which they record all shipments of waste materials from the site (hazardous and non-hazardous). The shipments recorded in the log book date back to at least 1998. After reviewing a number of the entries in the log book the EPA inspector, Gerard Crutchley, noted that the last recorded shipment of hazardous waste from the site was in September 1999 (72 lbs. paint gun cleaning solvent). The facility did ship a mixture of gasoline and water off site twelve days prior to the subject inspection, which, according to Mr. Peters, was shipped as hazardous waste. However, Mr. Peters went on to say that this was a one time event resulting from the recent flooding during Hurricane Isabel when one of the vehicles at the site was flooded. Later during the inspection, the EPA inspector noted that the material in question was 85 gallons of gasoline and water which was shipped to A & A Environmental, however the material was classified as a non-RCRA waste material to be recycled. A copy of the shipment manifest for this waste is provided as an attachment to this report (See Attachment No. 6).

In June 2003, the facility had hired Weston Solutions Inc. to sample and characterize five different waste streams generated at the facility. The five waste streams are floor washer sediment, spent part washer filters, brake washer residues, sand from the sand blaster and used absorbent material. All five waste streams were analyzed for the RCRA characteristics, ignitability, corrosivity, and TCLP RCRA Characteristics. The analytical results from these samples indicated that the aforementioned materials were non-hazardous. A copy of the analytical report from Weston Solutions is attached to this report (See Attachment No. 7).

The facility does generate wastewater from a vehicle washing area. Mr. Peters said the facility has a waste water discharge permit issued by the City of Baltimore. According to Mr. Peters, the waste water from the wash area drains to an oil/water separator unit located inside of the building and he thinks that the water from that unit discharges to the sanitary sewer system.

On the day of the inspection, but prior to the start of the inspection, the State inspector, Frank Ciurca, while waiting for the inspection to begin had observed some water running from the garage bay area of the facility across the parking area behind the building into a storm drain. At the beginning of the inspection, Frank Ciurca asked facility personnel if they had a storm water permit. According to information provided by Mr. Peters, the facility did at one time have a storm water permit. In February 2000, an Environmental Compliance Coordinator, Mr. Richard Hass, at the Postal Service's main office in Baltimore sent a *No Exposure Certification for Exclusion from NPDES Storm Water Permitting* to the Maryland Department of the Environment for the four vehicle maintenance facilities located in the Baltimore area (including the subject facility). A copy of the certification is attached to this report (See Attachment No. 8). The MDE acknowledged receipt of the exclusion and responded to the facility in a letter dated February 28, 2000 (See Attachment No. 9). Based on this, the Postal Service did not renew their storm water permit which expired in November 2002.

The State inspector, Frank Ciurca, told facility personnel that facilities that store vehicles for maintenance or other activities are not exempt from the General Industrial Storm Water Permitting requirements and required to have a storm water permit and a storm water pollution prevention plan. Mr. Ciurca informed facility personnel that within fourteen days they must obtain coverage under a General Industrial Permit and within thirty days develop a storm water pollution prevention plan. This information is documented in the inspection report written by Mr. Ciurca (See Attachment No. 10).

During the subject inspection the EPA inspector, Gerard Crutchley, completed a multi-media screening checklist. A copy of the completed checklist is attached to this report. Information regarding the various media programs discussed during the inspection are as follows:

RCRA, Subtitle C, Hazardous Waste

As previously stated, it appears that the facility does not generate any hazardous waste on a regular basis. The facility at one time used hazardous solvents in their part washing units, but have since switched to a non-hazardous solvent. The last recorded shipment of hazardous waste from the facility was in September 1999. The facility does have a paint spray gun cleaning station that uses a solvent that would be considered hazardous if disposed of as a waste, however the unit is equipped with an evaporator unit that recovers the used solvent from the cleaning unit. The facility is listed in EPA's IDEA database as a Conditionally Exempt Small Quantity Generator.

RCRA, Subtitle I, Underground Storage Tanks

At the time of the subject inspection, the facility did not have any underground storage tanks as defined at 40 CFR Part 280.12. The facility did at one time have fifteen underground storage tanks. By 1999, all of these were either removed from the ground or closed in place. During the inspection, the facility representatives provided the EPA inspectors with copies of Certificates of Closure for the Underground tanks and a copy of a letter from the Maryland Department of the Environment indicating that all of the tanks had been removed and that ten monitoring wells which had been installed to monitor groundwater could be abandoned because of the absence of liquid phase hydrocarbons in samples collected from these wells (See Attachment No. 11). Mr. Peters said that all of the monitoring wells have been closed out (concreted over). The facility could not locate any other tank closure records during the subject inspection.

Wetlands

There were no wetlands observed near the facility.

Spill Prevention, Control and Countermeasures (SPCC)

The only oil stored at the subject facility is in 55 gallon drums (new and used oil). As previously stated all of the underground storage tanks have been removed or closed in place. Mr. Peters said that they did at one time have a 275-gallon aboveground tank for storing new motor oil, however that tank was removed approximately five years ago.

Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)

The facility does not apply pesticides. According to Mr. Peters they have a contract with a pest control company (Atlantic Pest Control) who comes in on a quarterly basis to spray for pest control.

Clean Air Act

The facility does have an air permit issued by the State of Maryland for their paint spray booth (permit # 24-6-1502 N). The permit contains specific limitations for the volatile organic compound (VOC) content of various paints/coatings that may be used by facilities for vehicle refinishing. During the subject inspection, the facility personnel provided the EPA inspector with a copy of their permit limitations and also a copy of a sales report which indicates the paints/coatings purchased by the facility and their VOC content (See Attachment No. 12).

During the subject inspection, the EPA inspector asked facility personnel if they could identify the category of coating that each of the paint/coating products listed on the sale report belonged to so that a comparison could be made between the VOC content of the coatings versus the permit limitations. The sales report appears to be a listing of all paint/coating products purchased by the facility from January 2002 thru November 2003.

Subsequent to the inspection, the EPA inspector, Gerard Crutchley, made a simple comparison of the VOC contents of the paints/coatings on the sales report with the VOC permit limitations. Based on the comparison, it appears that the facility did use paints/coatings with a higher VOC content then is allowed by the permit.

As an example, an acrylic lacquer thinner listed on the sales report has a VOC content of 6.80 lbs/gal. This product was categorized as a topcoat and according to the limitations on the permit, topcoats have an allowable limit of 5.0 lbs/gal. The EPA inspector did contact the facility to confirm this information. The EPA inspector spoke with Mr. Donald Powell, who said that he did not know for sure, but after speaking with their painter, Mr. Larry Wheeler, it is possible that the products on the sales report were mis-classified and if properly classified they might not exceed the permit limitations. Mr. Powell also said that he thinks that the painters do use thinner in the paint before application.

The EPA inspector, Gerard Crutchley, asked facility personnel if there was any asbestos in the facility's building. Mr. Peters said that an asbestos/lead/radon survey was conducted at the facility in 1996. The report from that survey states that 27 bulk samples were collected of suspected asbestos containing building materials. Analytical results confirmed that asbestos was not present in any of the samples. However, the report goes on to say that some pipe insulation and fire proof doors are assumed to contain asbestos. According to Mr. Peters there has not been any removal of asbestos containing materials in the last eighteen months. A portion of the survey report is provided as an attachment to this report (See Attachment No. 13).

As previously stated in this report, the facility does not do any servicing work involving air conditioning systems in their vehicles, Mr. Peters said that all servicing work of systems containing refrigerants is conducted off site by a contractor.

Toxic Substances Control Act (PCBs)

The EPA inspector, Gerard Crutchley, asked facility personnel if they use any equipment (e.g., transformers, capacitors, hydraulic systems) that contain PCBs. Mr. Peters replied that all of the electrical power is supplied by Baltimore Gas & Electric and they do not have any oil filled electrical equipment. The facility does have hydraulic floor lifts, but the facility has no reason to suspect that the hydraulic fluid contains PCBs. The facility did provide a copy of the MSDS sheet for the hydraulic fluid which confirms that PCBs are not present in the fluid (See

Attachment No. 14).

Following the discussions with facility personnel, the EPA and State inspectors accompanied by Mr. Peters and Mr. Powell toured the subject facility to observe all areas of the facility and all of the maintenance activities. The observations noted in each of the areas toured are as follows:

Outside on the west side of the building, the inspectors observed a concrete island in a covered driveway area (See Photo Nos. 1 & 2). The concrete island was the location of the dispenser pumps for the underground fuel tanks that were once in use at the facility. Adjacent to the covered driveway area, the inspectors observed a large 40-yard roll off container. The facility personnel indicated that the roll off was used to accumulate scrap metal. The EPA inspectors noted that the roll off did contain pieces of scrap metal (car parts). The roll off container can be seen in Photo No. 5.

Behind the building is a large parking area for postal service vehicles. In the parking area, approximately 100 feet behind the building is a storm drain (See Photo No.3). There are six service/garage bays along the back of the maintenance building facing the parking area. At the time of the inspection, the pavement in the parking area was noticeably wet from three of the service bay doors down to the storm drain in the parking area. The wet pavement is depicted in Photo Nos. 4, 5, 6 & 8. This runoff from the service bays into the storm drain is what prompted the State inspector to question facility personnel about a storm water discharge permit. When questioned about the source of the runoff, facility personnel indicated that it was wash water from the vehicle washing bay (See Photo No. 7) and water from pressure washers in bays # 1 & 2. After some discussion, it was recommended to facility personnel that some type of containment be placed across the service/garage bay door to prevent any wash water from flowing outside onto the pavement and eventually to the storm drain.

According to the State inspector, Frank Ciurca, when he first observed this runoff prior to the inspection, he noted that it appeared to contain some oil and anti-freeze. Mr. Peters said that the service bays were washed out towards the bay doors, when they should have been washed towards the floor drains in the interior of the building. The observations noted by Frank Ciurca are documented in his inspection report (See Attachment No. 10).

The inspectors observed that the vehicle wash bay was designed with drains in the floor to direct the wash water to a sump, from which, it is pumped to the floor drainage line connected to one of the floor drains inside of the building (See Photo No. 9). The inspectors then moved to the other end of the shop area to observe the oil/water separator unit which was located in the floor of the building. The facility personnel removed the metal cover over the separator unit and the inspectors observed a square box type sump approximately 4 ½ to 5 feet deep (See Photo No. 10). The bottom of the area appeared to be covered with dirt. After closer examination, it was determined that the bottom of the square area was actually a metal cover for the separator unit (See Photo No. 11). There was a series of floor drains in the shop area which, according to facility personnel, drain to the oil/water separator unit (See Photo No. 12). When asked about the discharge from the oil/water separator unit, facility personnel did not know if it drained to the sanitary sewer system or to the storm water system. There was no documentation (e.g., schematics, etc.) available at the time of the inspection to confirm if the discharge drained to the sanitary or the storm water system. The inspectors recommended to facility personnel that they

conduct a dye test to determine the discharge point of the oil/water separator unit. The inspectors also recommended that the facility have someone service the separator unit to determine that it was operating properly

Subsequent to the inspection, the EPA inspector had contacted the facility with some follow up questions from the inspection and was told by Mr. Peters that they had hired a company to conduct a dye test of the floor drains and oil/water separator unit and the results of the test confirmed that the separator unit drained to the sanitary sewer system. The EPA inspector, Gerard Crutchley, asked Mr. Peters to provide a copy of the results to EPA.

The inspectors observed the facility's paint spray booth. The booth is equipped with an air circulation system that contains 40 exhaust filters (See Photo No. 13) and 8 intake filters. The person working in the area at the time of the inspection, Mr. Larry Wheeler, said that they change out the filters about every six months. Mr. Wheeler said that they dispose of the filters as regular trash. The EPA inspectors asked Mr. Peters if the filters had ever been tested to determine if they were hazardous. Mr. Peters said that the filters had never been analyzed for hazardous characteristics. The inspectors told facility personnel that they should have the filters tested to properly classify them as either hazardous or non-hazardous waste.

The EPA inspector asked Mr. Wheeler how they clean their paint spray equipment. Mr. Wheeler pointed to a paint gun washer and recycling unit (See Photo No. 14). He said all of the equipment is cleaned in this unit. The used thinner is then pumped to an evaporator unit (See Photo No. 15) which heats the thinner to remove any residue and paint pigment and the clean thinner is then recycled back to the cleaning unit for reuse. According to facility personnel, they have not had to dispose of any waste from this process.

Following the tour of the subject facility, the inspectors returned to Mr. Peters office to discuss RCRA Section 6002 requirements regarding the use of re-refined oils and lubricants, retread tires and engine coolants. The EPA inspector briefly explained to facility personnel that Executive Order 13101 (Greening the Government Through Waste Prevention, Recycling and Federal Acquisition) signed by President Clinton in 1998, directed EPA (under Section 403 of the order) to develop guidance for inspections of Federal Facilities to determine compliance with the buy-recycled program established under Section 6002 of RCRA.

The EPA inspector completed the inspection checklist for motor vehicle maintenance facilities which provides information on the use, by the facility, of re-refined oils and lubricants, retread tires and engine coolants. Based on the information received from facility personnel while completing the checklist it appears that the facility is aware of the requirements to purchase and use the aforementioned products. The facility generally does use these products and in the few instances where they do not use these products it is because they are not available or vehicle manufacturer specifications prohibit the use of the products. A completed copy of the checklist is attached to this report. The completed checklist was also forwarded to EPA, Region III's Waste and Chemical Management Division, State Programs Branch (Mike Giuranna & Howard Heim).

The EPA inspector also provided a copy of a Comprehensive Procurement Guidelines checklist to facility personnel, instructing them to complete the checklist and return it to EPA within a two-week period. This checklist provides information regarding the facility purchasing

and use of a number of different products, including construction products, non-paper office products, paper and paper products and various miscellaneous products.

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Baltimore Vehicle Maintenance Facility
60 W. Oliver St.
Baltimore, Maryland 21201-5783

Date of Inspection: November 24, 2003

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	Jose Jimenez Environmental Engineer EPA, Region III, Federal Facility Co-ordinator (215) 814-2148
Maryland Department of the Environment Representative:	Frank Ciurca Water Resources Engineer (410) 537-3521
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	Donald Powell Supervisor, Vehicle Supplies (410) 625-8929

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Inspection Activities/Observations

The EPA and State inspectors arrived at the subject facility on November 24, 2003 at

1000 and met with Mr. Leonard Peters and Mr. Donald Powell, Supervisor, Vehicle Supplies. The EPA inspectors presented their credentials to Mr. Peters identifying them as authorized representatives of EPA. The EPA inspectors provided Mr. Peters and Mr. Powell with a brief description of EPA Region III's Federal Facility Compliance Program and why the facility was selected for a multi-media inspection. The EPA team leader, Gerard Crutchley then provided facility personnel with a brief description of the scope of the subject inspection.

The EPA inspectors then asked Mr. Peters to provide a description of the subject facility, including the type of work that is performed on site and the waste materials that are generated as a result of the work. The facility, located at 60 W. Oliver St in Baltimore, was constructed in 1962. It has been a vehicle maintenance facility since that time. The facility comprises approximately 3.3 acres and consists of one large maintenance building. The facility employs approximately 36 people. They operate five days per week with a day and an evening shift. They also operate limited hours on the weekends. A listing of the employees and the hours worked is provided as an attachment to this report (See Attachment No. 5).

This facility is part of the U. S. Postal Service's VP Capital Metro Area. Mr. Peters as the manger for vehicle maintenance, oversees four facilities. The main facility located at 60 W. Oliver St, and three other vehicle maintenance facilities (Halethorpe, Parkville and Columbia). Each of the other three facilities operates independently of the main facility in terms of environmental management (e.g., they each have their own RCRA I.D. Nos.) and according to Mr. Peters there is no transfer of regulated waste materials between facilities. Mr. Peters did provide the inspectors with an organizational chart for the VP Capital Metro Area (See Attachment No. 4).

Mr. Peters said that the facility provides full maintenance services for approximately 1400 vehicles. These vehicles include tractor trailers, smaller cargo vans, small postal delivery vehicles, referred to as LLVs (long life vehicles), and some passenger type vehicles (sedans). Mr. Peters described the facility as generally a preventive maintenance type facility. They do normal type maintenance such as oil changes, tires, brakes, etc. Mr. Peters said they do some body work, including painting, but this does not comprise a large part of their normal workload. Mr. Peters said that only about 80 of the 1400 vehicles that they service are equipped with air conditioning. Mr. Peters said that any servicing of these units is contracted out and none is performed on site.

The facility does not have any vehicle fueling capability. According to Mr. Peters, the facility did have underground fuel tanks but they were all taken out of service and removed around 1998. Fueling facilities for U.S. Postal Service vehicles are currently located at another location in Baltimore City.

While conducting normal maintenance work, the facility does generate a number of waste materials including used oil, used anti-freeze, oil filters, trash, scrap metal, waste water, floor washer sediment, part washer filters, brake washer residue, spent sand from a sand blast unit, used absorbent material and spent filters from the paint booth.

According to Mr. Peters, the facility does not generate any hazardous waste. The facility at one time did use part washers that contained hazardous solvents, however they have since been changed over to non-hazardous part washers. The facility maintains a hand written log book in

which they record all shipments of waste materials from the site (hazardous and non-hazardous). The shipments recorded in the log book date back to at least 1998. After reviewing a number of the entries in the log book the EPA inspector, Gerard Crutchley, noted that the last recorded shipment of hazardous waste from the site was in September 1999 (72 lbs. paint gun cleaning solvent). The facility did ship a mixture of gasoline and water off site twelve days prior to the subject inspection, which, according to Mr. Peters, was shipped as hazardous waste. However, Mr. Peters went on to say that this was a one time event resulting from the recent flooding during Hurricane Isabel when one of the vehicles at the site was flooded. Later during the inspection, the EPA inspector noted that the material in question was 85 gallons of gasoline and water which was shipped to A & A Environmental, however the material was classified as a non-RCRA waste material to be recycled. A copy of the shipment manifest for this waste is provided as an attachment to this report (See Attachment No. 6).

In June 2003, the facility had hired Weston Solutions Inc. to sample and characterize five different waste streams generated at the facility. The five waste streams are floor washer sediment, spent part washer filters, brake washer residues, sand from the sand blaster and used absorbent material. All five waste streams were analyzed for the RCRA characteristics, ignitability, corrosivity, and TCLP RCRA Characteristics. The analytical results from these samples indicated that the aforementioned materials were non-hazardous. A copy of the analytical report from Weston Solutions is attached to this report (See Attachment No. 7).

The facility does generate wastewater from a vehicle washing area. Mr. Peters said the facility has a waste water discharge permit issued by the City of Baltimore. According to Mr. Peters, the waste water from the wash area drains to an oil/water separator unit located inside of the building and he thinks that the water from that unit discharges to the sanitary sewer system.

On the day of the inspection, but prior to the start of the inspection, the State inspector, Frank Ciurca, while waiting for the inspection to begin had observed some water running from the garage bay area of the facility across the parking area behind the building into a storm drain. At the beginning of the inspection, Frank Ciurca asked facility personnel if they had a storm water permit. According to information provided by Mr. Peters, the facility did at one time have a storm water permit. In February 2000, an Environmental Compliance Coordinator, Mr. Richard Hass, at the Postal Service's main office in Baltimore sent a *No Exposure Certification for Exclusion from NPDES Storm Water Permitting* to the Maryland Department of the Environment for the four vehicle maintenance facilities located in the Baltimore area (including the subject facility). A copy of the certification is attached to this report (See Attachment No. 8). The MDE acknowledged receipt of the exclusion and responded to the facility in a letter dated February 28, 2000 (See Attachment No. 9). Based on this, the Postal Service did not renew their storm water permit which expired in November 2002.

The State inspector, Frank Ciurca, told facility personnel that facilities that store vehicles for maintenance or other activities are not exempt from the General Industrial Storm Water Permitting requirements and required to have a storm water permit and a storm water pollution prevention plan. Mr. Ciurca informed facility personnel that within fourteen days they must obtain coverage under a General Industrial Permit and within thirty days develop a storm water pollution prevention plan. This information is documented in the inspection report written by Mr. Ciurca (See Attachment No. 10).

During the subject inspection the EPA inspector, Gerard Crutchley, completed a multi-media screening checklist. A copy of the completed checklist is attached to this report. Information regarding the various media programs discussed during the inspection are as follows:

RCRA, Subtitle C, Hazardous Waste

As previously stated, it appears that the facility does not generate any hazardous waste on a regular basis. The facility at one time used hazardous solvents in their part washing units, but have since switched to a non-hazardous solvent. The last recorded shipment of hazardous waste from the facility was in September 1999. The facility does have a paint spray gun cleaning station that uses a solvent that would be considered hazardous if disposed of as a waste, however the unit is equipped with an evaporator unit that recovers the used solvent from the cleaning unit. The facility is listed in EPA's IDEA database as a Conditionally Exempt Small Quantity Generator.

RCRA, Subtitle I, Underground Storage Tanks

At the time of the subject inspection, the facility did not have any underground storage tanks as defined at 40 CFR Part 280.12. The facility did at one time have fifteen underground storage tanks. By 1999, all of these were either removed from the ground or closed in place. During the inspection, the facility representatives provided the EPA inspectors with copies of Certificates of Closure for the Underground tanks and a copy of a letter from the Maryland Department of the Environment indicating that all of the tanks had been removed and that ten monitoring wells which had been installed to monitor groundwater could be abandoned because of the absence of liquid phase hydrocarbons in samples collected from these wells (See Attachment No. 11). Mr. Peters said that all of the monitoring wells have been closed out (concreted over). The facility could not locate any other tank closure records during the subject inspection.

Wetlands

There were no wetlands observed near the facility.

Spill Prevention, Control and Countermeasures (SPCC)

The only oil stored at the subject facility is in 55 gallon drums (new and used oil). As previously stated all of the underground storage tanks have been removed or closed in place. Mr. Peters said that they did at one time have a 275-gallon aboveground tank for storing new motor oil, however that tank was removed approximately five years ago.

Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)

The facility does not apply pesticides. According to Mr. Peters they have a contract with a pest control company (Atlantic Pest Control) who comes in on a quarterly basis to spray for pest control.

Clean Air Act

The facility does have an air permit issued by the State of Maryland for their paint spray booth (permit # 24-6-1502 N). The permit contains specific limitations for the volatile organic compound (VOC) content of various paints/coatings that may be used by facilities for vehicle refinishing. During the subject inspection, the facility personnel provided the EPA inspector with a copy of their permit limitations and also a copy of a sales report which indicates the paints/coatings purchased by the facility and their VOC content (See Attachment No. 12).

During the subject inspection, the EPA inspector asked facility personnel if they could identify the category of coating that each of the paint/coating products listed on the sale report belonged to so that a comparison could be made between the VOC content of the coatings versus the permit limitations. The sales report appears to be a listing of all paint/coating products purchased by the facility from January 2002 thru November 2003.

Subsequent to the inspection, the EPA inspector, Gerard Crutchley, made a simple comparison of the VOC contents of the paints/coatings on the sales report with the VOC permit limitations. Based on the comparison, it appears that the facility did use paints/coatings with a higher VOC content then is allowed by the permit.

As an example, an acrylic lacquer thinner listed on the sales report has a VOC content of 6.80 lbs/gal. This product was categorized as a topcoat and according to the limitations on the permit, topcoats have an allowable limit of 5.0 lbs/gal. The EPA inspector did contact the facility to confirm this information. The EPA inspector spoke with Mr. Donald Powell, who said that he did not know for sure, but after speaking with their painter, Mr. Larry Wheeler, it is possible that the products on the sales report were mis-classified and if properly classified they might not exceed the permit limitations. Mr. Powell also said that he thinks that the painters do use thinner in the paint before application.

The EPA inspector, Gerard Crutchley, asked facility personnel if there was any asbestos in the facility's building. Mr. Peters said that an asbestos/lead/radon survey was conducted at the facility in 1996. The report from that survey states that 27 bulk samples were collected of suspected asbestos containing building materials. Analytical results confirmed that asbestos was not present in any of the samples. However, the report goes on to say that some pipe insulation and fire proof doors are assumed to contain asbestos. According to Mr. Peters there has not been any removal of asbestos containing materials in the last eighteen months. A portion of the survey report is provided as an attachment to this report (See Attachment No. 13).

As previously stated in this report, the facility does not do any servicing work involving air conditioning systems in their vehicles, Mr. Peters said that all servicing work of systems containing refrigerants is conducted off site by a contractor.

Toxic Substances Control Act (PCBs)

The EPA inspector, Gerard Crutchley, asked facility personnel if they use any equipment (e.g., transformers, capacitors, hydraulic systems) that contain PCBs. Mr. Peters replied that all of the electrical power is supplied by Baltimore Gas & Electric and they do not have any oil filled electrical equipment. The facility does have hydraulic floor lifts, but the facility has no reason to suspect that the hydraulic fluid contains PCBs. The facility did provide a copy of the MSDS sheet for the hydraulic fluid which confirms that PCBs are not present in the fluid (See

Attachment No. 14).

Following the discussions with facility personnel, the EPA and State inspectors accompanied by Mr. Peters and Mr. Powell toured the subject facility to observe all areas of the facility and all of the maintenance activities. The observations noted in each of the areas toured are as follows:

Outside on the west side of the building, the inspectors observed a concrete island in a covered driveway area (See Photo Nos. 1 & 2). The concrete island was the location of the dispenser pumps for the underground fuel tanks that were once in use at the facility. Adjacent to the covered driveway area, the inspectors observed a large 40-yard roll off container. The facility personnel indicated that the roll off was used to accumulate scrap metal. The EPA inspectors noted that the roll off did contain pieces of scrap metal (car parts). The roll off container can be seen in Photo No. 5.

Behind the building is a large parking area for postal service vehicles. In the parking area, approximately 100 feet behind the building is a storm drain (See Photo No.3). There are six service/garage bays along the back of the maintenance building facing the parking area. At the time of the inspection, the pavement in the parking area was noticeably wet from three of the service bay doors down to the storm drain in the parking area. The wet pavement is depicted in Photo Nos. 4, 5, 6 & 8. This runoff from the service bays into the storm drain is what prompted the State inspector to question facility personnel about a storm water discharge permit. When questioned about the source of the runoff, facility personnel indicated that it was wash water from the vehicle washing bay (See Photo No. 7) and water from pressure washers in bays # 1 & 2. After some discussion, it was recommended to facility personnel that some type of containment be placed across the service/garage bay door to prevent any wash water from flowing outside onto the pavement and eventually to the storm drain.

According to the State inspector, Frank Ciurca, when he first observed this runoff prior to the inspection, he noted that it appeared to contain some oil and anti-freeze. Mr. Peters said that the service bays were washed out towards the bay doors, when they should have been washed towards the floor drains in the interior of the building. The observations noted by Frank Ciurca are documented in his inspection report (See Attachment No. 10).

The inspectors observed that the vehicle wash bay was designed with drains in the floor to direct the wash water to a sump, from which, it is pumped to the floor drainage line connected to one of the floor drains inside of the building (See Photo No. 9). The inspectors then moved to the other end of the shop area to observe the oil/water separator unit which was located in the floor of the building. The facility personnel removed the metal cover over the separator unit and the inspectors observed a square box type sump approximately 4 ½ to 5 feet deep (See Photo No. 10). The bottom of the area appeared to be covered with dirt. After closer examination, it was determined that the bottom of the square area was actually a metal cover for the separator unit (See Photo No. 11). There was a series of floor drains in the shop area which, according to facility personnel, drain to the oil/water separator unit (See Photo No. 12). When asked about the discharge from the oil/water separator unit, facility personnel did not know if it drained to the sanitary sewer system or to the storm water system. There was no documentation (e.g., schematics, etc.) available at the time of the inspection to confirm if the discharge drained to the sanitary or the storm water system. The inspectors recommended to facility personnel that they

conduct a dye test to determine the discharge point of the oil/water separator unit. The inspectors also recommended that the facility have someone service the separator unit to determine that it was operating properly

Subsequent to the inspection, the EPA inspector had contacted the facility with some follow up questions from the inspection and was told by Mr. Peters that they had hired a company to conduct a dye test of the floor drains and oil/water separator unit and the results of the test confirmed that the separator unit drained to the sanitary sewer system. The EPA inspector, Gerard Crutchley, asked Mr. Peters to provide a copy of the results to EPA.

The inspectors observed the facility's paint spray booth. The booth is equipped with an air circulation system that contains 40 exhaust filters (See Photo No. 13) and 8 intake filters. The person working in the area at the time of the inspection, Mr. Larry Wheeler, said that they change out the filters about every six months. Mr. Wheeler said that they dispose of the filters as regular trash. The EPA inspectors asked Mr. Peters if the filters had ever been tested to determine if they were hazardous. Mr. Peters said that the filters had never been analyzed for hazardous characteristics. The inspectors told facility personnel that they should have the filters tested to properly classify them as either hazardous or non-hazardous waste.

The EPA inspector asked Mr. Wheeler how they clean their paint spray equipment. Mr. Wheeler pointed to a paint gun washer and recycling unit (See Photo No. 14). He said all of the equipment is cleaned in this unit. The used thinner is then pumped to an evaporator unit (See Photo No. 15) which heats the thinner to remove any residue and paint pigment and the clean thinner is then recycled back to the cleaning unit for reuse. According to facility personnel, they have not had to dispose of any waste from this process.

Following the tour of the subject facility, the inspectors returned to Mr. Peters office to discuss RCRA Section 6002 requirements regarding the use of re-refined oils and lubricants, retread tires and engine coolants. The EPA inspector briefly explained to facility personnel that Executive Order 13101 (Greening the Government Through Waste Prevention, Recycling and Federal Acquisition) signed by President Clinton in 1998, directed EPA (under Section 403 of the order) to develop guidance for inspections of Federal Facilities to determine compliance with the buy-recycled program established under Section 6002 of RCRA.

The EPA inspector completed the inspection checklist for motor vehicle maintenance facilities which provides information on the use, by the facility, of re-refined oils and lubricants, retread tires and engine coolants. Based on the information received from facility personnel while completing the checklist it appears that the facility is aware of the requirements to purchase and use the aforementioned products. The facility generally does use these products and in the few instances where they do not use these products it is because they are not available or vehicle manufacturer specifications prohibit the use of the products. A completed copy of the checklist is attached to this report. The completed checklist was also forwarded to EPA, Region III's Waste and Chemical Management Division, State Programs Branch (Mike Giuranna & Howard Heim).

The EPA inspector also provided a copy of a Comprehensive Procurement Guidelines checklist to facility personnel, instructing them to complete the checklist and return it to EPA within a two-week period. This checklist provides information regarding the facility purchasing

and use of a number of different products, including construction products, non-paper office products, paper and paper products and various miscellaneous products.

This checklist is intended solely to assist inspectors in structuring an inspection and to help them ensure that common regulatory issues are not overlooked. It is not necessarily intended to represent an accurate record of the inspector's findings or observations. Notations and other comments on the checklist are not always to be viewed as direct observations by the inspector or actual fact, but may instead reflect claims by facility personnel or tentative responses which require further investigation for confirmation.

U.S. Environmental Protection Agency
Region III
Multi-Media Screening Checklist

Program	Check if Evaluated	Check if Facility is Subject to Program
Resource Conservation and Recovery Act (RCRA)	✓	
Underground Storage Tanks	✓	
Wetlands	✓	
Spill Prevention, Containment and Countermeasure (SPCC)	✓	
Federal Insecticide, Fungicide and Rodenticide Act (FIFRA)	✓	
Air	✓	
Toxic Substances Control Act (TSCA) - PCB	✓	
TSCA - Core	✓	
Water	✓	
Emergency Planning and Community Right-to-Know Act (EPCRA) (SARA - Title III)	✓	

General Information 11/24/03

FACILITY NAME UNITED STATES POSTAL SERVICE
BALTIMORE VEHICLE MAINTENANCE FACILITY

ADDRESS 60 W. OLIVER ST. BALTIMORE, MD. 21201-5783
(Street) (City) (State) (Zip)

CONTACT LEONARD PETERS, MANAGER, VEHICLE MAINTENANCE

PHONE NUMBER (410) 625-8930 (SIC CODE) 4311

DESCRIPTION OF FACILITY OPERATIONS The facility is the main vehicle maintenance facility for the U.S. Postal Services VP Capital Metro Area.

NUMBER OF EMPLOYEES 36

LATITUDE _____ LONGITUDE _____

INSPECTORS NAME GERARD CRUTCHLEY

SIGNATURE Gerard Crutchley

TITLE ENVIRONMENTAL PROTECTION SPECIALIST

DATE 11/24/03

NOTES: **This checklist is single sided to allow space on reverse side to record additional information.**

It is probably most efficient to combine, to the extent possible, the observational needs required for this checklist with those of the media specific inspection during one general tour of the facility. It may behoove the inspector to complete this checklist before making any tour of the facility so that he/she can better identify what needs to be looked at.

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) - HAZARDOUS WASTE

11/24/03

Regional Contact: Carol Amend **Phone:** 814-5430

1. **Ask** - Does the facility have an EPA RCRA ID Number?

   ✓ Yes _____ No If yes, provide MDD 980707483

2. **Ask** - Has the facility submitted a Part A or Part B RCRA permit application? _____ Yes X No

   If yes, describe_____

3. **Ask** - What are the hazardous wastes that the facility is generating?

   it appears that the facility is no longer generating any hazardous waste (last hazardous waste shipment Sept. 1999)

4. **Ask** - What is the total quantity (kilograms/month) of hazardous waste generated?

   N/A

5. **Ask** - Has the facility classified its waste as hazardous based on test results or knowledge of process?

   N/A (some waste streams analyzed, results indicated non-hazardous)

6. **Ask** - Are hazardous wastes accepted from other facilities for storage, treatment, or disposal? If yes, list those facilities.

   NO

7. **Observe** - Are there any tanks or drums containing waste material? If yes, describe (i.e., physical condition, labels/ markings, secondary containment, spills/ leaks, open containers and approximate numbers). Indicate how long the waste has been stored in tanks or containers?

   NO

8. **Observe** - Have any waste materials been dumped into pits, lagoons, etc. or placed on the ground in piles or landfills? If yes, list the waste material, approximate quantities and when and where it was dumped.

NO

9. **Observe** - Are any waste materials being burned for energy recovery? If yes, describe the units in which burning occurs.

NO

10. **Ask** - To see copies of manifests for the last year. Take a copy of a representative manifest for each type of waste. Don't worry about what it says, just copy it and all the attachments.

UNDERGROUND STORAGE TANKS (USTs) 11/24/03

REGIONAL CONTACT: Carol Amend **Phone:** 814-5430

1. **Ask** - Are there any underground storage tanks?
   _____ Yes __X__ No

2. **Ask** - Approximately how many? What are the contents? (wastes, virgin petroleum, or chemicals)

   all tanks were removed or closed in place prior to the inspection

3. **Ask/Observe** - What type of leak (release) detection is used (see next page for possible methods)? Does the facility have records showing that the method is, in fact, still in use?

   Tanks: N/A

   Piping: N/A

4. **Ask/Observe** - Have tanks been upgraded for spill and overfill protection and are steel tanks provided with cathodic protection against corrosion? _____ Yes _____ No
   N/A

5. **Observe** - Is there any evidence of leaks, spills, broken piping, broken fill/vent lines, or leaking pumps joints or valves? Provide location and description.

   N/A

6. **Ask** - Have the USTs been registered with the appropriate State agency? _____ Yes _____ No If so, request a copy of the registration form. N/A

UST CLOSURE

Closure of USTs must be performed according to regulation. If USTs are being closed, a notification of closure should be filed with the appropriate State agency 30 days prior to actual closure. Also, a site assessment should be performed.

1. **Ask/Observe** - Have any tanks been permanently closed/removed since registration form was submitted? __X__ Yes _____ No

   -If so, was notification of closure submitted to State?

   __X__ Yes _____ No

*** Methods of Release Detection for USTs:**

- Tank Tightness Testing and Inventory Control
- Automatic Tank Gauging System
- Interstitial Monitoring
- Groundwater Monitoring
- Manual Tank Gauging
- Vapor Monitoring
- Statistical Inventory Reconciliation

* **Methods of Release Detection for Piping:**

- Pressurized (P): Automatic flow restrictor; Automatic shutoff device, Continuous alarm system and Annual line testing

- Suction (S): Line testing every 3 years

* **Spill/Overfill Prevention:**

. Catchment Basins -and- .Automatic Shutoff Devices -or-
.Overfill Alarms -or-
.Ball Float Valves

WETLANDS 11/24/03

REGIONAL CONTACT: Jeffery Lapp
Phone Number: 814-2717

1. **Observe** - Are there any wet areas near the facility with wetland-type vegetation (cattails, rushes, sedges) that have been disturbed by waste disposal, excavation, or filling?

NO

- if yes - did facility obtain a federal Section 404 permit or any state or local permit authorizing the alteration?

N/A

SPILL PREVENTION, CONTAINMENT AND COUNTERMEASURE (SPCC)

11/24/03

REGIONAL CONTACT: David Wright

Telephone Number: 814-3293

1. **Ask/Observe** - Does the facility store oil above and/or below ground? _____ Yes __X__ No

2. **Ask/Observe** - Does the facility store more than 660 gallons in a single tank or more than 1320 gallons in a number of tanks above ground or more than 42,000 gallons below ground?
_____ Yes _____ No

   If yes, describe:

   the facility has only 55 gallon drums on site for new & used oils.

3. **Ask/Observe** - Does the facility have an SPCC (Spill prevention, Containment and Countermeasure) plan on hand?
_____ Yes _____ No N/A

4. **Ask/Observe** - Does the facility have a certified (engineers seal affixed) plan? _____ Yes _____ No N/A

   If yes, was it signed by a registered professional engineer?
_____ Yes _____ No

   When was it last updated? N/A

5. **Ask** - Has there been any major changes to oil storage at the facility since the last modification of the plan?
_____ Yes _____ No N/A

   If yes, describe:

6. **Observe** - What type of secondary containment is used at the facility? Were there any deficiencies in the secondary containment (cracks, breaks, dikes left open)? Is it adequate to contain the entire contents of the largest tank?

   N/A

7. **Ask** - Has the facility been identified, either through a self-selection process or by determination of the Regional Administrator, as one that could cause substantial harm to the environment ? _____Yes _____No N/A

Some criteria that apply are total storage capacity ≥42,000 gal. and performs overwater oil transfers to or from vessels **OR** total storage capacity ≥1,000,000 gal and one of the following: (1) inadequate secondary containment for ASTs, (2) reportable spills ≥10,000 gal within the past 5 years, (3) located in an environmentally sensitive area, or (4) one where a discharge would shut down a public drinking water intake.

If yes, answer the following: N/A

- Was a facility response plan prepared?
  _____ Yes _____ No

- Was the plan approved by EPA? _____ Yes _____ No

FEDERAL INSECTICIDE, FUNGICIDE, AND RODENTICIDE ACT (FIFRA)

11/24/03

REGIONAL CONTACT: Harry Daw
TELEPHONE: 814-3244

1. **Ask/Observe** - Does the facility manufacture or distribute any pesticides? _____ Yes ___X___ No

2. **Ask** - If yes, what is the establishment's EPA FIFRA registration number?

N/A

3. **Ask/Observe** - Where are these materials stored?

N/A

4. **Ask/Observe** - Does the facility apply pesticides?
_____ Yes ___X___ No

5. **Ask** - If yes, what is the registration number of the pesticide?

N/A

AIR: STATIONARY SOURCE COMPLIANCE

11/24/03

AIR CONTACT: Chris Pilla
814-3438

1. **Observe** - Is opaque smoke being emitted from a smokestack (dark enough not to observe anything behind the plume)?
_____ Yes __X__ No

   - If yes - which process unit(s) is emitting the opaque smoke (be specific, i.e., Boiler No. 4, incinerator, etc.)?

N/A

2. **Observe** - Describe areas where fugitive emissions (both gaseous and visible) are likely to occur (includes emissions from treatment systems, open top tanks, valves, flanges, etc.)

paint spray booth area

3. **Ask/Observe** - Do any of the process units have any air pollution control equipment to control emissions?
__X__ Yes _____ No

If yes, describe process/equipment:

filter system in the paint booth

   - Is any air pollution control equipment out of service?
_____ Yes __X__ No

   - If yes, when will it be back on line?

N/A

4. **Ask/Observe** - Does the facility have any coating* operations?
__X__ Yes _____ No paint spray booth

   - If yes, obtain list of coatings and lb/gal VOC content. Are these water-based or solvent based coatings?

See attachment No. 12

- Are emissions from coating process lines controlled?

  __X__ Yes _____ No

  If yes, describe control devices:

  filter system

5. **Ask/Observe** - Has the facility added any processes or expanded any pre-existing processes since 1980? _____ Yes __X__ No

   - If yes, describe any state or federal air permits obtained (operating; PSD**)?

     N/A

6. **Ask/Observe** - Is there any asbestos on site?
   _____ Yes _____ No not sure, but it is assumed there is some asbestos containg building materials on site.
7. **Ask/Observe** - Is the facility undergoing or has the facility undergone any renovations or demolitions during the last 18 months which involve the removal or disturbance of asbestos-containing materials? _____ Yes __X__ No

   If yes, describe how much asbestos (square feet or linear feet) was removed, where it was located and other details:

   N/A

8. **Ask** - If asbestos was removed was notification provided to the State and EPA? _____ Yes _____ No N/A

* Refers strictly to paints, lacquors, varnishes and inks and not to electroplating/metal finishing processes.

** Prevention of Significant Deterioration

9. **Ask/Observe** - Does the facility handle/emit any of the National Emission Standards for Hazardous Air Pollutants (NESHAP) chemicals other than asbestos (mercury, beryllium, vinyl chloride, benzene, arsenic, radionuclides)?
   _____ Yes __X__ No

   If yes, describe process:

_____

_____

_____

10. **Ask/Observe** - Does the facility perform any service/maintenance on any type of refrigeration equipment involving a refrigerant? _____ Yes __X__ No

If yes, answer the following:

- Does the facility have an EPA certified technician? _____ Yes _____ No N/A

  (If yes, get a copy of the certification card/certificate)

- Does the facility own and operate refrigerant recovery equipment? _____ Yes _____ No N/A

  (If yes, get the model and serial number of the equipment)

- Does the facility have a file copy of its equipment registration that was sent to EPA? _____ Yes _____ No N/A

- Does the facility have any refrigeration units with refrigerant charges of 50 lbs or greater? _____ Yes _____ No N/A

- What have been the leak rates on these larger units for the last three years? _____ N/A

- Does the facility keep all maintenance records for all units of 50 lbs or greater? _____ Yes _____ No N/A

- Are leaks above the allowable leak rate (35%/ year) repaired within 30 days, or 120 days if an industrial process shut down is required? _____ Yes _____ No N/A

- If the leaks have been repaired, was a follow-up verification test conducted before the refrigerant was recharged into the system? _____ Yes _____ No N/A

- If no repairs were conducted or repairs failed, was a retrofit or retirement plan prepared and available for review? _____ Yes _____ No N/A

11. **Ask/Observe** - Does the facility own and operate a dry clean machine? _____ Yes __X__ No

If yes, answer the following:

- Did this facility file an initial notification with EPA? _____ Yes _____ No N/A

- Did this facility file a pollution prevention compliance report with EPA? _____ Yes _____ No N/A

- Did this facility file a Control Compliance Report with EPA? _____ Yes _____ No N/A

- How much perchloroethylene was purchased during each calender year?

  1997 _____
  1996 _____
  1995 _____ N/A

- Does the facility maintain purchasing records for these purchases of perchloroethylene? _____ Yes _____ No N/A

- Who is the facility's current perchloroethylene supplier?

  Name:
  Phone Number: N/A

- Obtain the following information for each dry cleaning machine: name of manufacturer, model #, serial #, and date installed. N/A

- Does the facility have an O&M manual for each of its dry-cleaning machines? _____ Yes _____ No N/A

- Does the facility maintain leak detection and repair logs? _____ Yes _____ No N/A

- Does the facility have control equipment to control the perchloroethylene (perc) emissions? _____ Yes _____ No

  If yes, describe: N/A

  _____

  _____

TOXIC SUBSTANCES CONTROL ACT (TSCA) - PCB 11/24/03

REGIONAL CONTACT: AQUANETTA DICKENS **TELEPHONE:** 814-2080

1. **Ask/Observe** - Does the facility use equipment (i.e., transformers, capacitors, hydraulic/heat transfer systems, etc.) that contains PCBs? _____ Yes __X__ No

   - If yes, does the facility have analysis indicating the concentration of PCBs or is PCB status based on nameplate information?

     N/A

   - Is equipment labelled (yellow labels) _____ Yes _____ No N/A

2. **Ask/Observe** - Does the facility store PCBs on site?

   - If yes, describe storage area (including containment provisions) and its location and whether area itself and items stored there are labelled

     N/A

3. **Ask** - How long were items in storage?

   N/A

4. **Observe** - Is there any evidence of PCB spills or leaking PCB equipment? _____ Yes _____ No N/A

   If yes, describe:

5. **Ask** - If facility uses PCB transformer(s) (PCB >500 ppm), have they been registered with the local fire department?
   _____ Yes _____ No N/A

6. **Ask** - Does the facility prepare annual documents for its PCBs
   _____ Yes _____ No N/A

7. **Ask** - Does the facility perform quarterly inspections of its PCB transformers? _____ Yes _____ No
   N/A

TSCA CORE

1. **Ask** - Does the facility manufacture or import chemicals?
   _____ Yes ___X___ No

   If yes, answer the following question:

2. **Ask** - Are chemical substances used <u>solely</u> for foods, drugs, or pesticide purposes? _____ Yes _____ No
   N/A
   If no, answer the following questions:

3. **Ask** - What are the names and Chemical Abstract Service Registration Numbers (CASRN) of the chemical substances and what are their end uses, annual production and/or imported volumes (pounds)?

   N/A

4. **Ask** - Has the facility ever submitted Inventory Updating Reports (IUR) under TSCA to EPA? _____ Yes _____ No
   N/A

5. **Ask** - Does the facility have a working research and development laboratory (i.e., more than a simple QC lab?)
   _____ Yes _____ No N/A

6. **Ask** - Has the facility ever submitted a Pre-Manufacturing Notification (PMN) under TSCA to the EPA? _____ Yes _____ No

   If yes, describe: N/A

<u>NOTE:</u> **Attached to this checklist are two copies of a TSCA Notice of Inspection and Receipt for Samples and Documents. These documents must be provided to the facility at the time of the inspection. Give one copy to the facility and retain one copy for EPA records.**

WATER 11/24/03

REGIONAL CONTACTS: Lori Reynolds - 814-5435
Karen Johnson - 814-5445

1. **Ask/Observe** - Does the facility use water in its manufacturing process? ✓ Yes _____ No

   If yes, does the facility discharge process wastewater, cooling water, stormwater, or any other pollutant into the receiving stream, municipal sewer system or a subsurface disposal system (e.g., septic tank, well, cesspool, drywell, etc.)? ✓ Yes _____ No

   If yes, describe each discharge and where it goes:

   facility uses water to wash vehicles. The runoff is supposed to drain to an oil/water seperator unit and then discharge to the sanitary sewer.

2. **Ask** - Does the facility have a permit for each of these discharges? To streams: NPDES or Stormwater To POTW: Pre-Treatment To subsurface: Underground Injection Control
   _____ Yes _____ No

(Continued on 2nd page)

3. **Ask/Observe** - Does the facility treat its wastewater prior to discharging? ✓ Yes _____ No

   If yes, how? (what treatment systems are employed?

   o/w seperator unit

4. **Ask/Observe** - Is the effluent from the wastewater treatment facilities clear and free of solids? _____ Yes _____ No N/A

5. **Ask/Observe** - Does the equipment appear to be operating properly, clean and well maintained? _____ Yes _____ No N/A

6. **Observe** - Are there any unusual odors? _____ Yes ✓ No

7. **Ask/Observe** - Does the facility have floor drains in its processing or chemical storage areas? ✓ Yes _____ No

   If yes, what materials are likely to be spilled down the floor drains?

   wash water, oils/fluids from vehicles

If yes, where do the floor drains discharge (treatment facility, municipal sewer, directly to the receiving water or into the septic tank, cesspool, dry well)?

discharge to an o/w seperator then to the sanitary sewer

8. **Ask/Observe** - What is the disposal method for the wastewater sludges generated?

N/A

9. **Ask** - Is facility in compliance with discharge limitations? _____ Yes _____ No N/A

10. **Ask** - Does the facility have a stormwater pollution prevention plan? _____ Yes ✓ No

11. **Ask** - Is the drinking water supply private or public? If private, where are the wells located?

public water

12. **Ask** - Is the drinking water sampled and analyzed for contaminants? _____ Yes _____ No N/A

If yes, are the results reported to the state or EPA?

During the inspection, wash water was observed flowing from the garage bays outside to a storm water drain.

EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT (EPCRA) SARA-TITLE III
REGIONAL CONTACT: Aquanetta Dickens/David Wright 11/24/03
TELEPHONE: 814-2080/814-3293

1. **Ask** - Has the facility had a release of a hazardous substance in excess of reportable Superfund quantities within the last year?* _____ Yes __X__ No

   If yes, what was the substance and approximate quantity?

   _____

   Was EPA/State notified? _____ Yes _____ No

   Was notification oral or written?_____

2. **Ask** - Does the facility manufacture, process, or otherwise use any toxic chemicals in a quantity greater than 10,000 lbs. per year? _____ Yes __X__ No

   If yes, identify them and approximate amounts manufactured, processed or used.

   _____

   N/A

   _____

3. **Ask** - Are any of these toxic chemicals identified among those listed as Section 313 chemicals?* _____ Yes _____ No

   _____

   N/A

4. **Ask** - Has the facility submitted any toxic chemical release forms (Form R) to EPA?

   _____

   N/A

5. **Ask** - Does the facility have a threshold planning quantity of any substance (minimum of 10,000 lbs. of a hazardous substance and/or a minimum of 500 lbs. of an extremely hazardous substance)* that requires submission of a materials safety data sheet (MSDS) to the State Emergency Response Commission (SERC) and/or the Local Emergency Planning Committee (LEPC)?
   _____ Yes _____ No

   If yes, has the facility submitted any hazardous chemical inventory forms (Tier II) to the State Emergency Response Commission and/or Local Emergency Planning Committee?

_____ Yes _____ No

6. **Ask** - Are the MSDS sheets on site? _____ Yes _____ No

N/A

* The chemicals subject to these requirements can be found in EPA publication number 560/4-92-011, January 1992, "Title III, List of Lists".

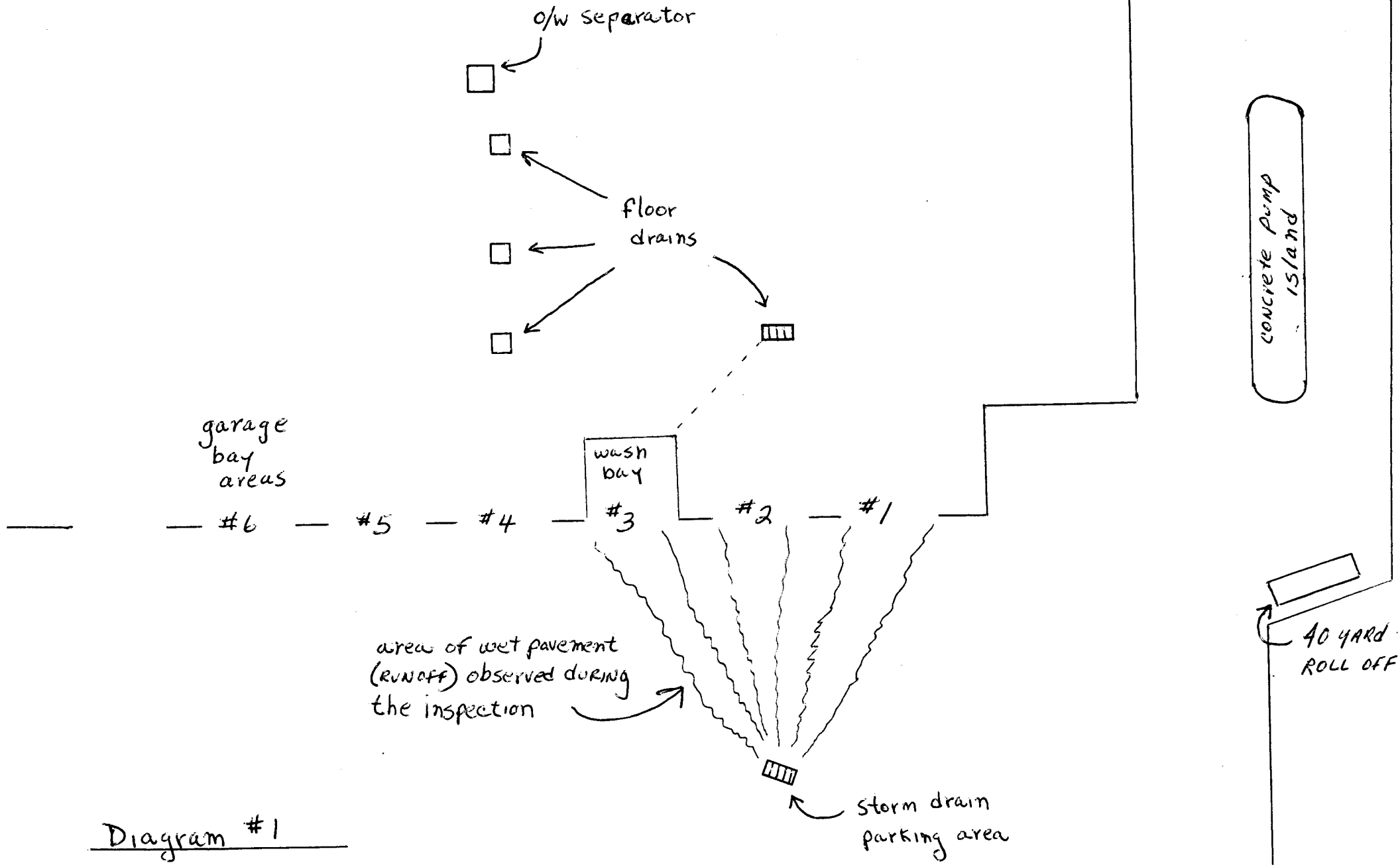


Diagram #1

USPS VEHICLE maintenance facility

11/24/03

Attachment No. 7

Weston Solutions, Inc.
Suite 200
1395 Piccard Drive
Rockville, Maryland 20850-4391
301-208-6800 • Fax 301-208-6801
www.westonsolutions.com

July 29, 2003

Mr. Leonard Peters
Manager, Baltimore Vehicle Maintenance Facility
United States Postal Service
60 West Oliver St.
Baltimore, MD 21233

Re: Waste Characterization for Baltimore VMF
SOW: CM-CM-03-0003

Dear Mr. Peters:

Weston Solutions, Inc. (WESTON®) is pleased to submit the final report for the characterization of wastes at your facility. The format and contents of the reports are based on the Statement of Work (SOW) for this task and our proposal dated May 12, 2003.

Samples from each of the five waste streams of interest (floor washer sediment, spent parts washer filters, brake washer residue, sand from the sand blaster and used absorbent material) were collected on June 17, 2003 in accordance with EPA Waste sampling protocol. All samples were sent to Severn Trent Laboratory for analyses. Severn Trent Laboratories is certified in the State of Maryland to perform drinking water analyses; presently, no other accreditation is offered or required by the State.

One semi-aqueous sample was collected from each of the five waste streams and analyzed for TCLP volatile organic compounds (VOCs), TCLP semi-volatile organic compounds (SVOCs), TCLP metal analytes, pH, and ignitability. A water sample was also collected from the floor washer sediment waste stream and analyzed for total petroleum hydrocarbons (TPH) (diesel range organics), TPH (gasoline range organics), Biological Oxygen Demand (BOD), oil and grease, pH, total phosphorous, total suspended solids, total Kjeldahl nitrogen (TKN), total metals (cadmium, chromium, copper, lead, nickel, and zinc), target compound list (TCL) VOCs and TCL SVOCs. The water sample from the floor washer sediment was collected for potential comparison to permit discharge limits for industrial Wastewater since water from the floor washer is released to the City of Baltimore's sanitary sewer system.

Also, only one of the parts washer filters was sampled because shop personnel indicated that the parts washers were used to clean the same types of parts. The fluid used in the parts washer is not disposed as a waste. The fluid is instead recycled inside the machine until it evaporates, and

additional fluid is then added to refill the machine. The parts washer selected for waste analysis had been in service for the longest period of time since the filter was last changed.

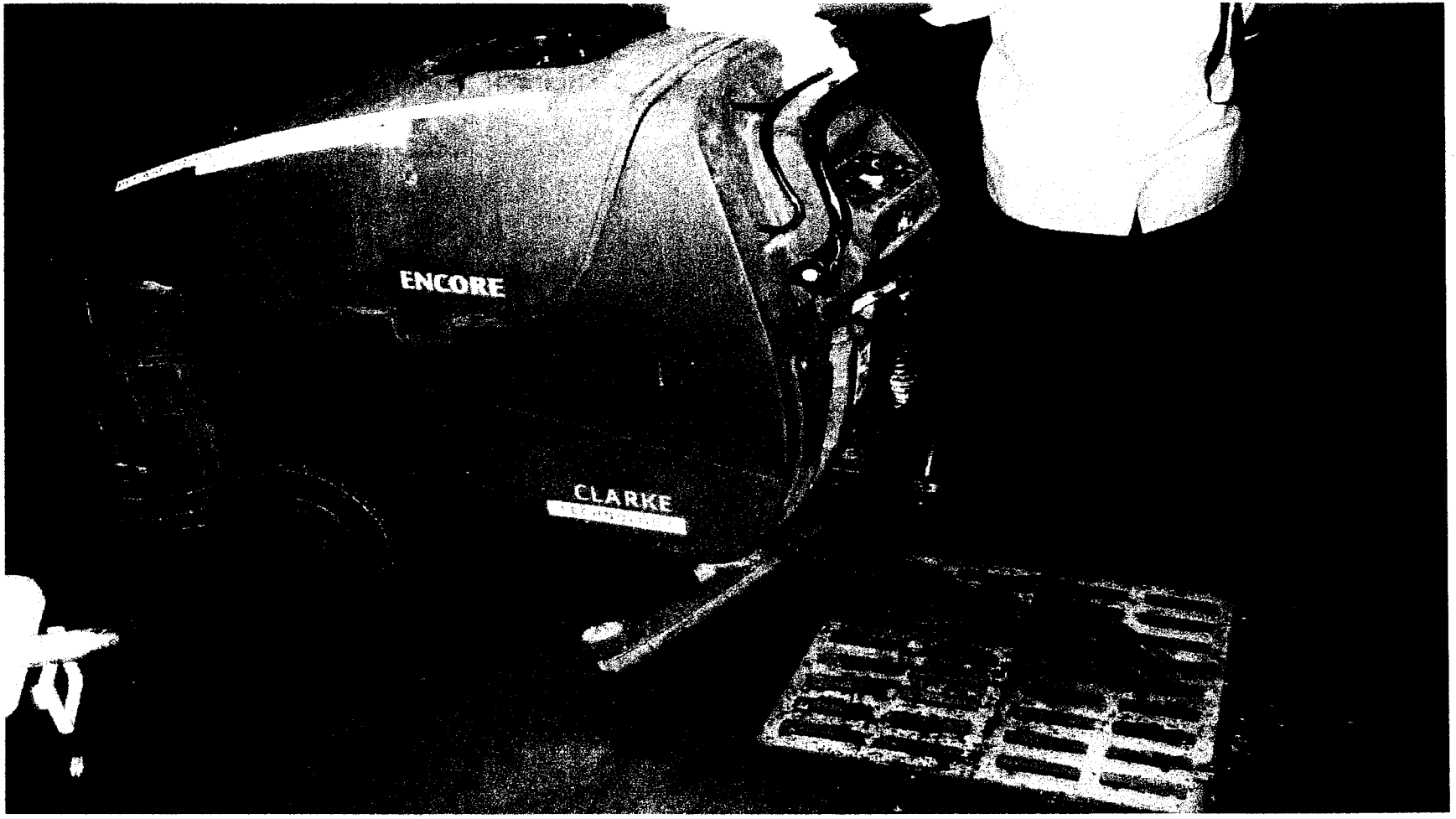
The analytical results of the waste streams are tabulated with the requested information included in the attached summary sheets for your review. The results were compared against the RCRA limits for the associate compound or analyte. The water sample is to be compared against the wastewater discharge limits for the local Publicly Operated Treatment Works (POTW); however, the facility was unable to provide the discharge limits.

A copy of the final report was also sent to Mr. Sam Obeidallah, Area Environmental Compliance Specialist. If you have any questions, please call Jim Ruffing at (301) 208-6881 or myself.

Very truly yours,
Weston Solutions, Inc.

Jeffrey Nelson, P.E.
Client Service Manager

Attachments



Floor Washer Sediment Waste Stream

Waste Characterization Report

WASTE STREAM CHARACTERIZATION FOR FLOOR WASHER SEDIMENT

TABLE 1A
Summary of Analytical Results for RCRA Organic Compounds

Sample ID: BVMF-WC01B						
Compound	Date Sample Collected	Date Sample Analyzed	EPA ID Code	RCRA TCLP Limits (mg/L)	Result (mg/L)	Qualifier
1,1-Dichloroethene,TCLP	6/17/2003	6/25/2003	D029	0.7	0.1	U
1,2-Dichloroethane,TCLP		6/25/2003	D028	0.5	0.1	U
1,4-Dichlorobenzene,TCLP		7/1/2003	D027	7.5	0.1	U
2,4,5-Trichlorophenol,TCLP		7/1/2003	D041	400	0.5	U
2,4,6-Trichlorophenol,TCLP		7/1/2003	D042	2	0.1	U
2,4-Dinitrotoluene,TCLP		7/1/2003	D030	0.13	0.1	U
2-Butanone (MEK),TCLP		6/25/2003	D035	200	0.1	U
2-Methylphenol (o-cresol),TCLP		7/1/2003	D026	200	0.1	U
3,4-Methylphenol (m/p-cresol),TCLP		7/1/2003			0.1	U
Benzene,TCLP		6/25/2003	D018	0.5	0.1	U
Carbon tetrachloride,TCLP		6/25/2003	D019	0.5	0.1	U
Chlorobenzene,TCLP		6/25/2003	D021	100	0.1	U
Chloroform,TCLP		6/25/2003	D022	6	0.1	U
Hexachlorobenzene,TCLP		7/1/2003	D032	0.13	0.1	U
Hexachlorobutadiene,TCLP		7/1/2003	D033	0.5	0.1	U*
Hexachloroethane,TCLP		7/1/2003	D034	3	0.1	U*
Nitrobenzene,TCLP		7/1/2003	D036	2	0.1	U
Pentachlorophenol,TCLP		7/1/2003	D037	100	0.5	U
Pyridine,TCLP		7/1/2003	D038	5	0.2	U
Tetrachloroethene,TCLP		6/25/2003	D039	0.7	0.1	U
Trichloroethene,TCLP		6/25/2003	D040	0.5	0.1	U
Vinyl chloride,TCLP		6/25/2003	D043	0.2	0.1	U

Notes:

U (organic analyses) - Not detected above reported limit.

* (organic analyses) - Batch QC exceeds upper or lower control limits.

WASTE STREAM CHARACTERIZATION FOR FLOOR WASHER SEDIMENT

TABLE 1B
Summary of Analytical Results for RCRA Metals Analytes

Sample ID: BVMF-WC01B						
Analyte	Date Sample Collected	Date Sample Analyzed	EPA ID Code	RCRA TCLP Limits (mg/L)	Result (mg/L)	Qualifier
Arsenic,TCLP	6/17/2003	6/26/2003	D004	5	0.059	B
Barium,TCLP			D005	100	3.2	
Cadmium,TCLP			D006	1	0.066	
Chromium,TCLP			D007	5	0.14	
Copper,TCLP			--	--	3.6	
Iron,TCLP			--	--	15	
Lead,TCLP			D008	5	0.53	
Manganese,TCLP			--	--	0.25	
Mercury,TCLP			D009	0.2	0.0020	U
Nickel,TCLP			--	--	0.10	
Selenium,TCLP			D010	1	0.016	B
Silver,TCLP			D011	5	0.050	U
Zinc,TCLP			--	--	2.0	

TABLE 1C
Summary of Analytical Results for RCRA Characteristics

Sample ID: BVMF-WC01B						
RCRA Characteristic	Date Sample Collected	Date Sample Analyzed	EPA ID Code	RCRA TCLP Limits	Result	Qualifier
% Solids	6/17/2003	6/23/2003	--	--	2.10%	
Ignitability (Flashpoint)		6/30/2003	D001	< 140	>200	
Corrosivity (pH Solid)		6/30/2003	D002	less than or equal to 2 or greater than or equal to 12.5	10.6	
Temperature at Analysis (°C)		6/30/2003	--	--	21.0	

Notes:

-- - No RCRA code or RCRA limit exists.

B (metals analyses) - Result less than the reporting limit but greater than the instrument detection limit.

U (metals analyses) - Not detected above reported limit.

Summary of Analyses

Sediment from the Floor Washer is Non-hazardous.

WASTEWATER CHARACTERIZATION FOR FLOOR WASHER WATER/SEDIMENT

TABLE 2A

Summary of Analytical Results for Organic Compounds of Wastewater with Floor Washer Sediment

Sample ID: BVMF-WC01A on Chain-of-Custody (BMMF-WC01A on Laboratory Sheets) - Same Sample						
Compound/Analyte	CAS No.	Date Sample Collected	Date Sample Analyzed	Waste Water Permit Limits (ug/L)	Result (ug/L)	Qualifier
Volatile Organic Compounds						
Chloromethane	74-87-3				100	U*
Vinyl chloride	75-01-4				100	U
Bromomethane	74-83-9				100	U
Chloroethane	75-00-3				100	U
1,1-Dichloroethene	75-35-4				100	U
Carbon disulfide	75-15-0				500	U
Acetone	67-64-1				500	U
Methylene chloride	75-09-2				100	U
1,1-Dichloroethane	75-34-3				100	U
2-Butanone (MEK)	78-93-3				500	U
Chloroform	67-66-3				100	U
1,1,1-Trichloroethane	71-55-6				100	U
Carbon tetrachloride	56-23-5				100	U
1,2-Dichloroethene (total)	540-59-0				100	U
Benzene	71-43-2				100	U
1,2-Dichloroethane	107-06-2				100	U
Trichloroethene	79-01-6	6/17/2003	6/25/2003		100	U
1,2-Dichloropropane	78-87-5				100	U
Bromodichloromethane	75-27-4				100	U
cis-1,3-Dichloropropene	10061-01-5				100	U
4-Methyl-2-pentanone (MIBK)	108-10-1				500	U
Toluene	108-88-3				100	U
trans-1,3-Dichloropropene	10061-02-6				100	U
1,1,2-Trichloroethane	79-00-5				100	U
Tetrachloroethene	127-18-4				100	U
2-Hexanone	591-78-6				500	U
Dibromochloromethane	124-48-1				100	U
Chlorobenzene	108-90-7				100	U
Ethylbenzene	100-41-4				100	U
Styrene	100-42-5				100	U
Bromoform	75-25-2				100	U
1,1,2,2-Tetrachloroethane	79-34-5				100	U
Xylenes (total)	1330-20-7				100	U

Notes:

U (organic analyses) - Not detected above reported limit.

* (organic analyses) - Batch QC exceeds upper or lower control limits.

WASTEWATER CHARACTERIZATION FOR FLOOR WASHER WATER/SEDIMENT

TABLE 2B

Summary of Analytical Results for Organic Compounds of Wastewater with Floor Washer Sediment

Sample ID: BVMF-WC01A on Chain-of-Custody (BMMF-WC01A on Laboratory Sheets) - Same Sample						
Compound/Analyte	**CAS No.**	**Collected**	**Analyzed**	**Limits (ug/L)**	**Result (ug/L)**	**Qualifier**
Semi-Volatile OrganicCompounds						
Phenol	108-95-2	6/17/2003	6/30/2003		50	U
Bis(2-chloroethyl)ether	111-44-4				50	U
1,3-Dichlorobenzene	541-73-1				50	U
1,4-Dichlorobenzene	106-46-7				50	U
1,2-Dichlorobenzene	95-50-1				50	U
2-Methylphenol (o-cresol)	95-48-7				50	U
2,2-oxybis (1-chloropropane)	108-60-1				50	U
n-Nitroso-di-n-propylamine	621-64-7				50	U
Hexachloroethane	67-72-1				50	U
4-Methylphenol (m/p-cresol)	106-44-5				50	U
2-Chlorophenol	95-57-8				50	U
Nitrobenzene	98-95-3				50	U
Bis(2-chloroethoxy)methane	111-91-1				50	U
1,2,4-Trichlorobenzene	120-82-1				50	U
Isophorone	78-59-1				50	U
2,4-Dimethylphenol	105-67-9				50	U
Hexachlorobutadiene	87-68-3				50	U
Naphthalene	91-20-3				50	U
2,4-Dichlorophenol	120-83-2				50	U
4-Chloroaniline	106-47-8				50	U
2,4,6-Trichlorophenol	88-06-2				50	U
2,4,5-Trichlorophenol	95-95-4				250	U
Hexachlorocyclopentadiene	77-47-4				50	U*
2-Methylnaphthalene	91-57-6				50	U
2-Nitroaniline	88-74-4				250	U
2-Chloronaphthalene	91-58-7				50	U
4-Chloro-3-methylphenol	59-50-7				50	U
2,6-Dinitrotoluene	606-20-2				50	U
2-Nitrophenol	88-75-5				50	U
3-Nitroaniline	99-09-2				250	U
Dimethyl phthalate	131-11-3				50	U
2,4-Dinitrophenol	51-28-5				250	U

Notes:

U (organic analyses) - Not detected above reported limit.

* (organic analyses) - Batch QC exceeds upper or lower control limits.

WASTEWATER CHARACTERIZATION FOR FLOOR WASHER WATER/SEDIMENT

TABLE 2B (continued)

Summary of Analytical Results for Organic Compounds of Wastewater with Floor Washer Sediment

Sample ID: BVMF-WC01A on Chain-of-Custody (BMMF-WC01A on Laboratory Sheets) - Same Sample						
Compound/Analyte	CAS No.	Date Sample Collected	Date Sample Analyzed	Waste Water Permit Limits (ug/L)	Result (ug/L)	Qualifier
Semi-Volatile OrganicCompounds (continued)						
Acenaphthylene	208-96-8	6/17/2003	6/30/2003		50	U
2,4-Dinitrotoluene	121-14-2				50	U
Acenaphthene	83-32-9				50	U
Dibenzofuran	132-64-9				50	U
4-Nitrophenol	100-02-7				250	U
Fluorene	86-73-7				50	U
4-Nitroaniline	100-01-6				250	U
4-Bromophenyl phenyl ether	101-55-3				50	U
Hexachlorobenzene	118-74-1				50	U
Diethyl phthalate	84-66-2				50	U
4-Chlorophenyl phenyl ether	7005-72-3				50	U
Pentachlorophenol	87-86-5				250	U
n-Nitrosodiphenylamine	86-30-6				50	U
4,6-Dinitro-2-methylphenol	534-52-1				250	U
Phenanthrene	85-01-8				50	U
Anthracene	120-12-7				50	U
Carbazole	86-74-8				50	U
Di-n-butyl phthalate	84-74-2				31	J
Fluoranthene	206-44-0				50	U
Pyrene	129-00-0				50	U
Butyl benzyl phthalate	85-68-7				100	
Benzo(a)anthracene	56-55-3				50	U
Chrysene	218-01-9				50	U
3,3-Dichlorobenzidine	91-94-1				99	U
Bis(2-ethylhexyl)phthalate	117-81-7				380	
Di-n-octyl phthalate	117-84-0				50	U
Benzo(b)fluoranthene	205-99-2				50	U
Benzo(k)fluoranthene	207-08-9				50	U
Benzo(a)pyrene	50-32-8				50	U
Indeno(1,2,3-cd)pyrene	193-39-5				50	U
Dibenzo(a,h)anthracene	53-70-3				50	U
Benzo(ghi)perylene	191-24-2				50	U

Notes:

U (organic analyses) - Not detected above reported limit.

* (organic analyses) - Batch QC exceeds upper or lower control limits.

WASTEWATER CHARACTERIZATION FOR FLOOR WASHER WATER/SEDIMENT

TABLE 2C

Summary of Analytical Results for Metal Analytes of Wastewater with Floor Washer Sediment

Sample ID: BVMF-WC01A on Chain-of-Custody (BMMF-WC01A on Laboratory Sheets) - Same Sample						
Compound/Analyte	CAS No.	Date Sample Collected	Date Sample Analyzed	Waste Water Permit Limits (mg/L)	Result (mg/L)	Qualifier
Metal Analytes						
Cadmium	7440-43-9	6/17/2003	6/21/2003		0.40	
Chromium	7440-47-3		06/21/03		0.82	
Copper	7440-50-8		06/21/03		14	
Lead	7439-92-1		06/21/03		4.9	
Nickel	7440-02-0		6/21/2003		0.44	
Zinc	7440-66-6		6/23/2003		20	

TABLE 2D

Summary of Analytical Results for Additional Analyses of Wastewater with Floor Washer Sediment

Sample ID: BVMF-WC01A on Chain-of-Custody (BMMF-WC01A on Laboratory Sheets) - Same Sample						
Compound/Analyte	CAS No.	Date Sample Collected	Date Sample Analyzed	Waste Water Permit Limits (mg/L)	Result (mg/L)	Qualifier
Additional Analyses						
TPH - Diesel Range Organics, DRO	--	6/17/2003	6/21/2003		18	
TPH - Gasoline Range Organics, GRO	--		6/26/2003		3.4	
Biochemical Oxygen Demand, BOD	--		6/18/2003		2100	*
Oil and Grease, HEM	--		7/1/2003		690	
pH (*pH units*)	--		6/18/2003		*10.76*	
Phosphorous, Total as P	7723-14-0		6/27/2003		83	
Solids, Total Suspended, TSS	--		6/19/2003		920	
Nitrogen, Total Kjeldahl as N	7727-37-9		6/24/2003		22	

Notes:

-- - No CAS Number exists.

B (metals analyses) - Result less than the reporting limit but greater than the instrument detection limit.

U (metals analyses) - Not detected above reported limit.

* (additional analyses) - Batch QC exceeds upper or lower control limits.

Spent Parts Washer Filters Waste Stream

Waste Characterization Report

WASTE CHARACTERIZATION FOR SPENT PARTS WASHER FILTER

TABLE 1A
Summary of Analytical Results for RCRA Organic Compounds

Sample ID: BVMF-WC02						
Compound	Date Sample Collected	Date Sample Analyzed	EPA ID Code	RCRA TCLP Limits (mg/L)	Result (mg/L)	Qualifier
1,1-Dichloroethene,TCLP	6/17/2003	6/25/2003	D029	0.7	0.1	U
1,2-Dichloroethane,TCLP		6/25/2003	D028	0.5	0.1	U
1,4-Dichlorobenzene,TCLP		7/1/2003	D027	7.5	0.1	U
2,4,5-Trichlorophenol,TCLP		7/1/2003	D041	400	0.5	U
2,4,6-Trichlorophenol,TCLP		7/1/2003	D042	2	0.1	U
2,4-Dinitrotoluene,TCLP		7/1/2003	D030	0.13	0.1	U
2-Butanone (MEK),TCLP		6/25/2003	D035	200	0.1	U
2-Methylphenol (o-cresol),TCLP		7/1/2003	D026	200	0.1	U
3,4-Methylphenol (m/p-cresol),TCLP		7/1/2003			0.1	U
Benzene,TCLP		6/25/2003	D018	0.5	0.1	U
Carbon tetrachloride,TCLP		6/25/2003	D019	0.5	0.1	U
Chlorobenzene,TCLP		6/25/2003	D021	100	0.1	U
Chloroform,TCLP		6/25/2003	D022	6	0.1	U
Hexachlorobenzene,TCLP		7/1/2003	D032	0.13	0.1	U
Hexachlorobutadiene,TCLP		7/1/2003	D033	0.5	0.1	U*
Hexachloroethane,TCLP		7/1/2003	D034	3	0.1	U*
Nitrobenzene,TCLP		7/1/2003	D036	2	0.1	U
Pentachlorophenol,TCLP		7/1/2003	D037	100	0.5	U
Pyridine,TCLP		7/1/2003	D038	5	0.2	U
Tetrachloroethene,TCLP		6/25/2003	D039	0.7	0.1	U
Trichloroethene,TCLP		6/25/2003	D040	0.5	0.1	U
Vinyl chloride,TCLP		6/25/2003	D043	0.2	0.1	U

Notes:

U (organic analyses) - Not detected above reported limit.

* (organic analyses) - Batch QC exceeds upper or lower control limits.

WASTE CHARACTERIZATION FOR SPENT PARTS WASHER FILTER

TABLE 1B
Summary of Analytical Results for RCRA Metals Analytes

Sample ID: BVMF-WC02						
Analyte	Date Sample Collected	Date Sample Analyzed	EPA ID Code	RCRA TCLP Limits (mg/L)	Result (mg/L)	Qualifier
Arsenic,TCLP	6/17/2003	6/26/2003	D004	5	0.011	B
Barium,TCLP			D005	100	0.11	B
Cadmium,TCLP			D006	1	0.016	B
Chromium,TCLP			D007	5	0.052	
Copper,TCLP			--	--	0.16	
Iron,TCLP			--	--	6.0	
Lead,TCLP			D008	5	0.050	U
Manganese,TCLP			--	--	0.23	
Mercury,TCLP			D009	0.2	0.0020	U
Nickel,TCLP			--	--	0.22	
Selenium,TCLP			D010	1	0.10	U
Silver,TCLP			D011	5	0.050	U
Zinc,TCLP			--	--	3.0	

TABLE 1C
Summary of Analytical Results for RCRA Characteristics

Sample ID: BVMF-WC02						
RCRA Characteristic	Date Sample Collected	Date Sample Analyzed	EPA ID Code	RCRA TCLP Limits	Result	Qualifier
% Solids	6/17/2003	6/23/2003	--	--	57.40%	
Ignitability (Flashpoint)		6/30/2003	D001	< 140	>200	
Corrosivity (pH Solid)		6/30/2003	D002	less than or equal to 2 or greater than or equal to 12.5	9.2	
Temperature at Analysis (°C)		6/30/2003	--	--	21.5	

Notes:

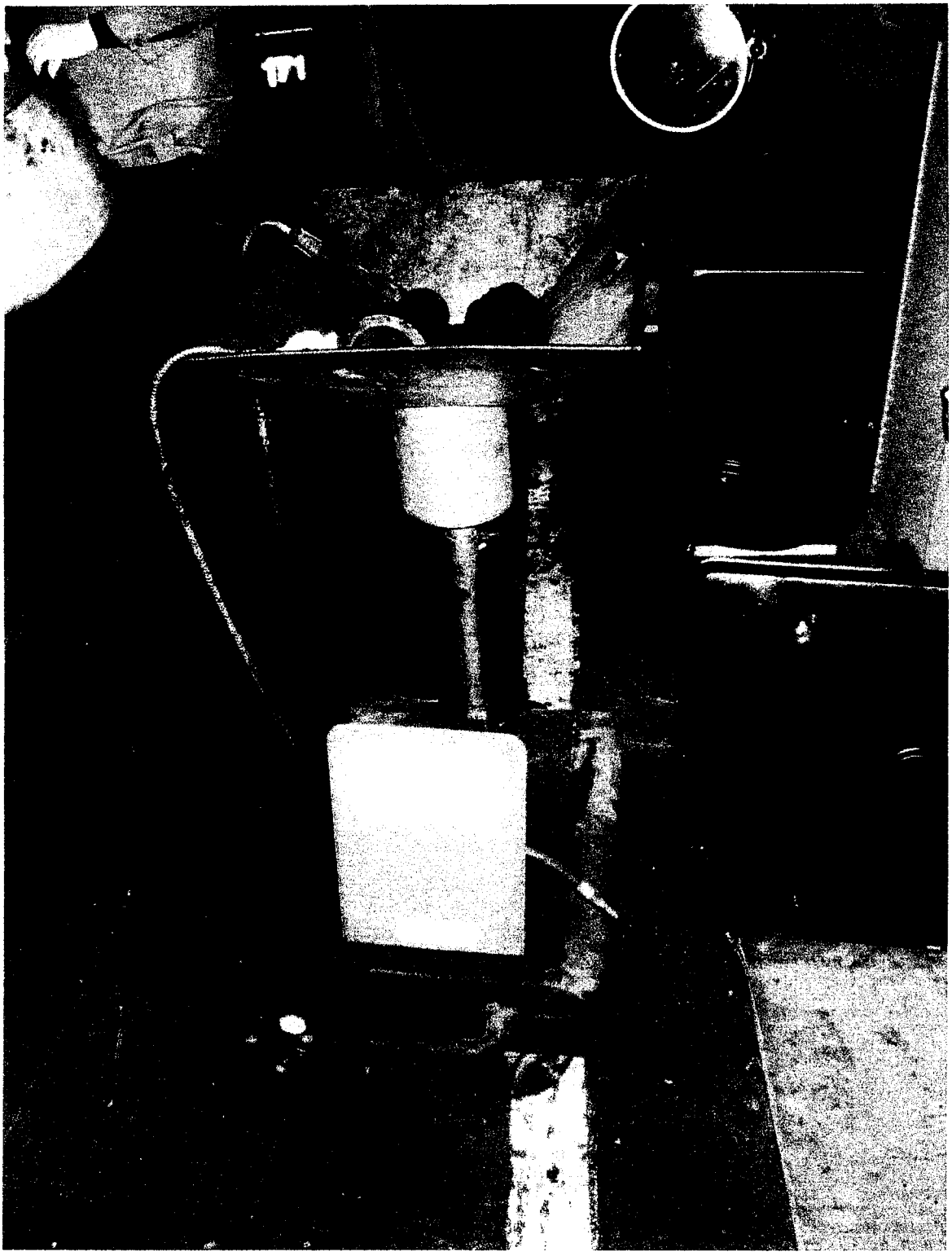
-- - No RCRA code or RCRA limit exists.

B (metals analyses) - Result less than the reporting limit but greater than the instrument detection limit.

U (metals analyses) - Not detected above reported limit.

Summary of Analyses

Spent Filters from the Parts Washers are Non-hazardous.



Brake Washer Residue Waste Stream

Waste Characterization Report

WASTE CHARACTERIZATION FOR BRAKE WASH RESIDUE

TABLE 1A
Summary of Analytical Results for RCRA Organic Compounds

Sample ID: BVMF-WC03						
Compound	Date Sample Collected	Date Sample Analyzed	EPA ID Code	RCRA TCLP Limits (mg/L)	Result (mg/L)	Qualifier
1,1-Dichloroethene,TCLP	6/17/2003	6/25/2003	D029	0.7	0.1	U
1,2-Dichloroethane,TCLP		6/25/2003	D028	0.5	0.1	U
1,4-Dichlorobenzene,TCLP		7/1/2003	D027	7.5	0.1	U
2,4,5-Trichlorophenol,TCLP		7/1/2003	D041	400	0.5	U
2,4,6-Trichlorophenol,TCLP		7/1/2003	D042	2	0.1	U
2,4-Dinitrotoluene,TCLP		7/1/2003	D030	0.13	0.1	U
2-Butanone (MEK),TCLP		6/25/2003	D035	200	0.1	U
2-Methylphenol (o-cresol),TCLP		7/1/2003	D026	200	0.1	U
3,4-Methylphenol (m/p-cresol),TCLP		7/1/2003			0.1	U
Benzene,TCLP		6/25/2003	D018	0.5	0.1	U
Carbon tetrachloride,TCLP		6/25/2003	D019	0.5	0.1	U
Chlorobenzene,TCLP		6/25/2003	D021	100	0.1	U
Chloroform,TCLP		6/25/2003	D022	6	0.1	U
Hexachlorobenzene,TCLP		7/1/2003	D032	0.13	0.1	U
Hexachlorobutadiene,TCLP		7/1/2003	D033	0.5	0.1	U*
Hexachloroethane,TCLP		7/1/2003	D034	3	0.1	U*
Nitrobenzene,TCLP		7/1/2003	D036	2	0.1	U
Pentachlorophenol,TCLP		7/1/2003	D037	100	0.5	U
Pyridine,TCLP		7/1/2003	D038	5	0.2	U
Tetrachloroethene,TCLP		6/25/2003	D039	0.7	0.1	U
Trichloroethene,TCLP		6/25/2003	D040	0.5	0.1	U
Vinyl chloride,TCLP		6/25/2003	D043	0.2	0.1	U

Notes:

U (organic analyses) - Not detected above reported limit.

* (organic analyses) - Batch QC exceeds upper or lower control limits.

WASTE CHARACTERIZATION FOR BRAKE WASH RESIDUE

TABLE 1B
Summary of Analytical Results for RCRA Metals Analytes

Sample ID: BVMF-WC03						
Analyte	Date Sample Collected	Date Sample Analyzed	EPA ID Code	RCRA TCLP Limits (mg/L)	Result (mg/L)	Qualifier
Arsenic,TCLP	6/17/2003	6/26/2003	D004	5	0.014	B
Barium,TCLP			D005	100	0.26	B
Cadmium,TCLP			D006	1	0.050	U
Chromium,TCLP			D007	5	0.050	U
Copper,TCLP			--	--	0.84	
Iron,TCLP			--	--	0.10	U
Lead,TCLP			D008	5	0.050	U
Manganese,TCLP			--	--	1.0	
Mercury,TCLP			D009	0.2	0.0020	U
Nickel,TCLP			--	--	0.49	
Selenium,TCLP			D010	1	0.10	U
Silver,TCLP			D011	5	0.050	U
Zinc,TCLP			--	--	1.7	

TABLE 1C
Summary of Analytical Results for RCRA Characteristics

Sample ID: BVMF-WC03						
RCRA Characteristic	Date Sample Collected	Date Sample Analyzed	EPA ID Code	RCRA TCLP Limits	Result	Qualifier
% Solids	6/17/2003	6/23/2003	--	--	26.50%	
Ignitability (Flashpoint)		6/30/2003	D001	< 140	>200	
Corrosivity (pH Solid)		6/30/2003	D002	less than or equal to 2 or greater than or equal to 12.5	8.2	
Temperature at Analysis (°C)		6/30/2003	--	--	21.5	

Notes:

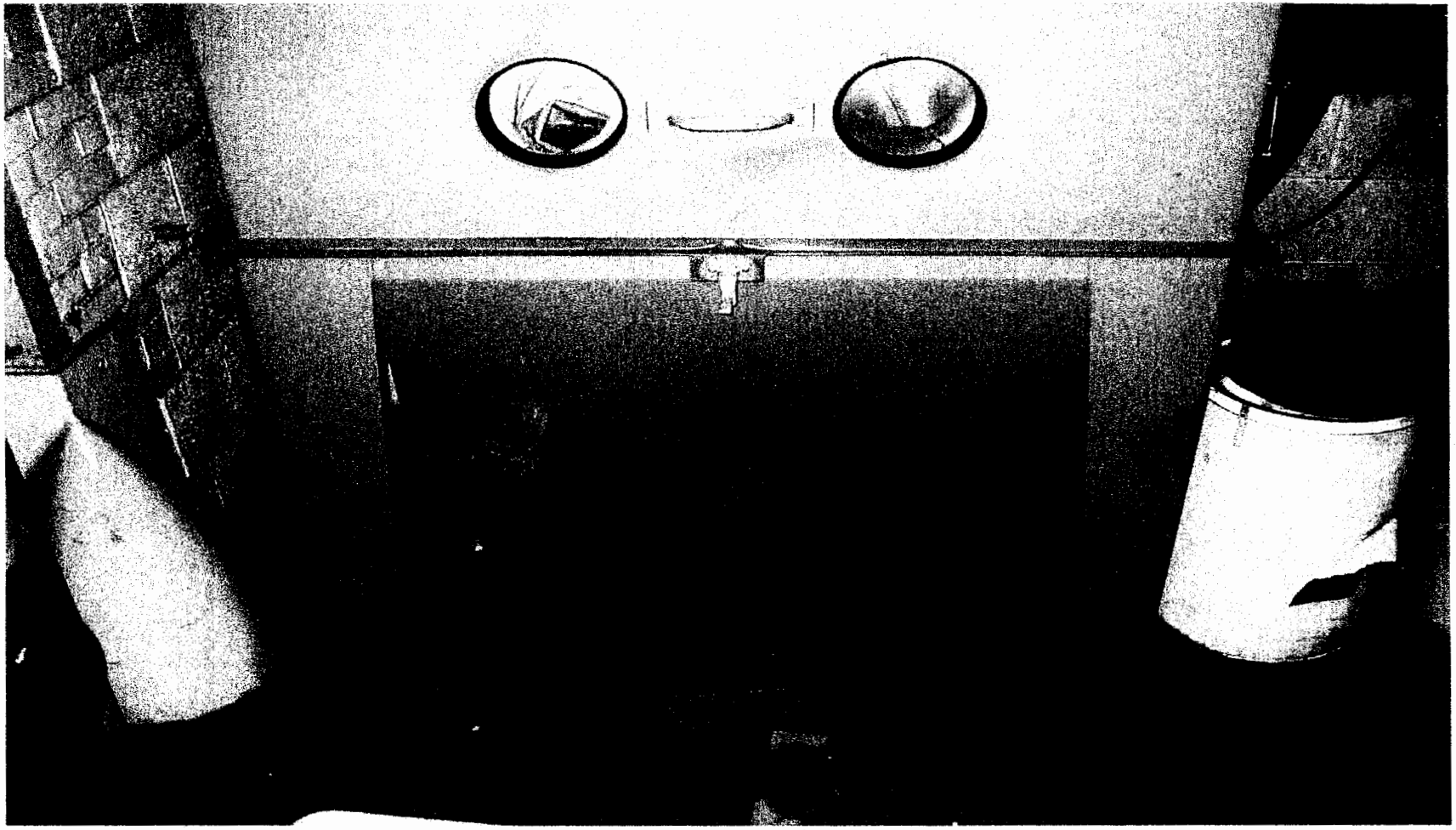
-- - No RCRA code or RCRA limit exists.

B (metals analyses) - Result less than the reporting limit but greater than the instrument detection limit.

U (metals analyses) - Not detected above reported limit.

Summary of Analyses

Brake Washer Residue is Non-hazardous.



Sand from Sand Blaster Waste Stream

Waste Characterization Report

WASTE CHARACTERIZATION FOR SAND FROM SAND BLASTER

TABLE 1A
Summary of Analytical Results for RCRA Organic Compounds

Sample ID: BVMF-WC04						
Compound	Date Sample Collected	Date Sample Analyzed	EPA ID Code	RCRA TCLP Limits (mg/L)	Result (mg/L)	Qualifier
1,1-Dichloroethene,TCLP	6/17/2003	6/25/2003	D029	0.7	0.1	U
1,2-Dichloroethane,TCLP		6/25/2003	D028	0.5	0.1	U
1,4-Dichlorobenzene,TCLP		7/1/2003	D027	7.5	0.1	U
2,4,5-Trichlorophenol,TCLP		7/1/2003	D041	400	0.5	U
2,4,6-Trichlorophenol,TCLP		7/1/2003	D042	2	0.1	U
2,4-Dinitrotoluene,TCLP		7/1/2003	D030	0.13	0.1	U
2-Butanone (MEK),TCLP		6/25/2003	D035	200	0.1	U
2-Methylphenol (o-cresol),TCLP		7/1/2003	D026	200	0.1	U
3,4-Methylphenol (m/p-cresol),TCLP		7/1/2003			0.1	U
Benzene,TCLP		6/25/2003	D018	0.5	0.1	U
Carbon tetrachloride,TCLP		6/25/2003	D019	0.5	0.1	U
Chlorobenzene,TCLP		6/25/2003	D021	100	0.1	U
Chloroform,TCLP		6/25/2003	D022	6	0.1	U
Hexachlorobenzene,TCLP		7/1/2003	D032	0.13	0.1	U
Hexachlorobutadiene,TCLP		7/1/2003	D033	0.5	0.1	U*
Hexachloroethane,TCLP		7/1/2003	D034	3	0.1	U*
Nitrobenzene,TCLP		7/1/2003	D036	2	0.1	U
Pentachlorophenol,TCLP		7/1/2003	D037	100	0.5	U
Pyridine,TCLP		7/1/2003	D038	5	0.2	U
Tetrachloroethene,TCLP		6/25/2003	D039	0.7	0.1	U
Trichloroethene,TCLP		6/25/2003	D040	0.5	0.1	U
Vinyl chloride,TCLP		6/25/2003	D043	0.2	0.1	U

Notes:

U (organic analyses) - Not detected above reported limit.

* (organic analyses) - Batch QC exceeds upper or lower control limits.

WASTE CHARACTERIZATION FOR SAND FROM SAND BLASTER

TABLE 1B
Summary of Analytical Results for RCRA Metals Analytes

Sample ID: BVMF-WC04						
Analyte	Date Sample Collected	Date Sample Analyzed	EPA ID Code	RCRA TCLP Limits (mg/L)	Result (mg/L)	Qualifier
Arsenic,TCLP	6/17/2003	6/26/2003	D004	5	0.10	U
Barium,TCLP			D005	100	0.79	B
Cadmium,TCLP			D006	1	0.048	B
Chromium,TCLP			D007	5	0.029	B
Copper,TCLP			--	--	0.18	
Iron,TCLP			--	--	26	
Lead,TCLP			D008	5	1.7	
Manganese,TCLP			--	--	0.64	
Mercury,TCLP			D009	0.2	0.0020	U
Nickel,TCLP			--	--	2.5	
Selenium,TCLP			D010	1	0.10	U
Silver,TCLP			D011	5	0.050	U
Zinc,TCLP			--	--	14	

TABLE 1C
Summary of Analytical Results for RCRA Characteristics

Sample ID: BVMF-WC04						
RCRA Characteristic	Date Sample Collected	Date Sample Analyzed	EPA ID Code	RCRA TCLP Limits	Result	Qualifier
% Solids	6/17/2003	6/23/2003	--	--	93.60%	
Ignitability (Flashpoint)		6/30/2003	D001	< 140	>200	
Corrosivity (pH Solid)		6/30/2003	D002	less than or equal to 2 or greater than or equal to 12.5	8.1	
Temperature at Analysis (°C)		6/30/2003	--	--	21.4	

Notes:

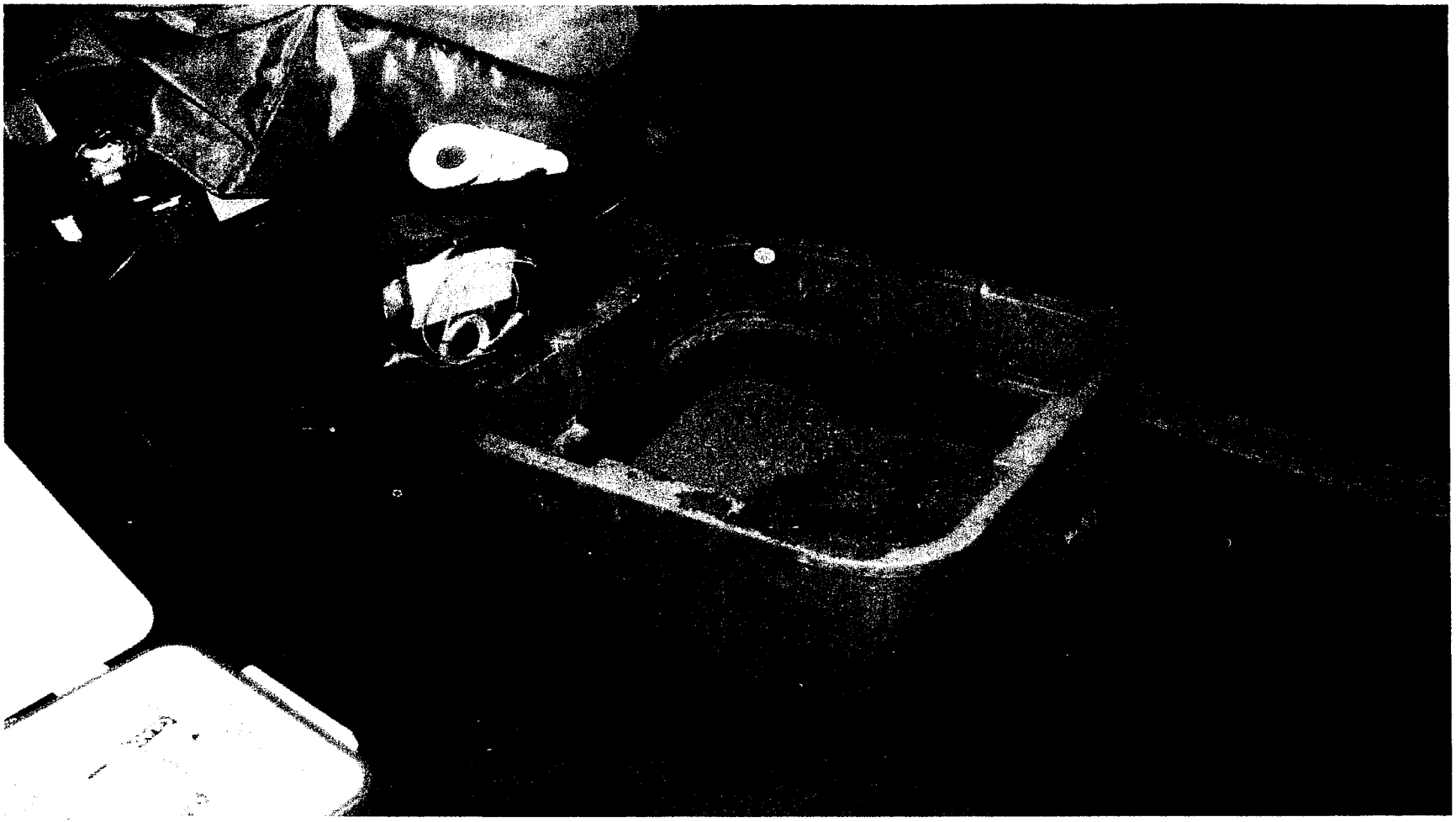
-- - No RCRA code or RCRA limit exists.

B (metals analyses) - Result less than the reporting limit but greater than the instrument detection limit.

U (metals analyses) - Not detected above reported limit.

Summary of Analyses

Sand from the Sand Blaster is Non-hazardous.



Used Absorbent Material Waste Stream

Waste Characterization Report

WASTE CHARACTERIZATION FOR USED ABSORBENT MATERIAL

TABLE 1A
Summary of Analytical Results for RCRA Organic Compounds

Sample ID: BVMF-WC05						
Compound	Date Sample Collected	Date Sample Analyzed	EPA ID Code	RCRA TCLP Limits (mg/L)	Result (mg/L)	Qualifier
1,1-Dichloroethene,TCLP	6/17/2003	6/25/2003	D029	0.7	0.1	U
1,2-Dichloroethane,TCLP		6/25/2003	D028	0.5	0.1	U
1,4-Dichlorobenzene,TCLP		7/1/2003	D027	7.5	0.1	U
2,4,5-Trichlorophenol,TCLP		7/1/2003	D041	400	0.5	U
2,4,6-Trichlorophenol,TCLP		7/1/2003	D042	2	0.1	U
2,4-Dinitrotoluene,TCLP		7/1/2003	D030	0.13	0.1	U
2-Butanone (MEK),TCLP		6/25/2003	D035	200	0.1	U
2-Methylphenol (o-cresol),TCLP		7/1/2003	D026	200	0.1	U
3,4-Methylphenol (m/p-cresol),TCLP		7/1/2003			0.1	U
Benzene,TCLP		6/25/2003	D018	0.5	0.1	U
Carbon tetrachloride,TCLP		6/25/2003	D019	0.5	0.1	U
Chlorobenzene,TCLP		6/25/2003	D021	100	0.1	U
Chloroform,TCLP		6/25/2003	D022	6	0.1	U
Hexachlorobenzene,TCLP		7/1/2003	D032	0.13	0.1	U
Hexachlorobutadiene,TCLP		7/1/2003	D033	0.5	0.1	U*
Hexachloroethane,TCLP		7/1/2003	D034	3	0.1	U*
Nitrobenzene,TCLP		7/1/2003	D036	2	0.1	U
Pentachlorophenol,TCLP		7/1/2003	D037	100	0.5	U
Pyridine,TCLP		7/1/2003	D038	5	0.2	U
Tetrachloroethene,TCLP		6/25/2003	D039	0.7	0.1	U
Trichloroethene,TCLP		6/25/2003	D040	0.5	0.1	U
Vinyl chloride,TCLP		6/25/2003	D043	0.2	0.1	U

Notes:

U (organic analyses) - Not detected above reported limit.

* (organic analyses) - Batch QC exceeds upper or lower control limits.

WASTE CHARACTERIZATION FOR USED ABSORBENT MATERIAL

TABLE 1B
Summary of Analytical Results for RCRA Metals Analytes

Sample ID: BVMF-WC05						
Analyte	Date Sample Collected	Date Sample Analyzed	EPA ID Code	RCRA TCLP Limits (mg/L):	Result (mg/L)	Qualifier
Arsenic,TCLP	6/17/2003	6/26/2003	D004	5	0.10	U
Barium,TCLP			D005	100	0.57	B
Cadmium,TCLP			D006	1	0.050	U
Chromium,TCLP			D007	5	0.050	U
Copper,TCLP			--	--	0.019	B
Iron,TCLP			--	--	0.15	
Lead,TCLP			D008	5	0.0056	B
Manganese,TCLP			--	--	0.84	
Mercury,TCLP			D009	0.2	0.0020	U
Nickel,TCLP			--	--	0.050	U
Selenium,TCLP			D010	1	0.10	U
Silver,TCLP			D011	5	0.050	U
Zinc,TCLP			--	--	0.44	

TABLE 1C
Summary of Analytical Results for RCRA Characteristics

Sample ID: BVMF-WC05						
RCRA Characteristic	Date Sample Collected	Date Sample Analyzed	EPA ID Code	RCRA TCLP Limits:	Result	Qualifier
% Solids	6/17/2003	6/23/2003	--	--	91.00%	
Ignitability (Flashpoint)		6/30/2003	D001	< 140	>200	
Corrosivity (pH Solid)		6/30/2003	D002	less than or equal to 2 or greater than or equal to 12.5	4.6	
Temperature at Analysis (°C)		6/30/2003	--	--	21.1	

Notes:

-- - No RCRA code or RCRA limit exists.

B (metals analyses) - Result less than the reporting limit but greater than the instrument detection limit.

U (metals analyses) - Not detected above reported limit.

Summary of Analyses

Used Absorbent Material is Non-hazardous.